

Location and Extent Staff Report

Date: September 24, 2025

To: Douglas County Planning Commission

From: Trevor Bedford, AICP, Senior Planner

Jeanette Bare, AICP, Planning Manager Sk for Ja

Steven E. Koster, AICP, Assistant Director of Planning Services

Subject: River Canyon Filing 2, 3rd Amendment, Lot 2A-1 – Location and Extent

Project File: LE2025-018

Planning Commission Hearing:

October 6, 2025 @ 6:00 p.m.

I. EXECUTIVE SUMMARY

Dominion Water and Sanitation District (DWSD) requests approval of a Location and Extent (L&E) for the proposed refurbishment and expansion of the Chatfield Basin Water Reclamation Facility (CBWRF) to provide wastewater treatment and surface water discharge to the South Platte River. The project is located between Caretaker Road and the High Line Canal, approximately 1,200 feet southwest of the intersection of Dante Drive and Waterton Road in the Roxborough area. The applicant states that the project is necessary to provide Sterling Ranch, The Range, and Louviers communities with reliable wastewater services.

The property is approximately 10 acres and is zoned General Industrial and Planning Area 2 (Industrial) of the River Canyon Planned Development. The property is located within the Pike National Forest Subarea as identified by the 2040 Comprehensive Master Plan.

II. APPLICATION INFORMATION

A. Applicant

Andrea Cole Dominion Water and Sanitation District 9250 E Costilla Avenue Greenwood Village, CO 80012

B. Applicant's Representative

Matt Padgett
Dominion Water and Sanitation District
9250 E Costilla Avenue
Greenwood Village, CO 80012

C. Request

The applicant requests approval of an L & E for the refurbishment and expansion of the Chatfield Basin Water Reclamation Facility (CBWRF).

D. Location

The project is located between Caretaker Road and the High Line Canal, approximately 1,200 feet southwest of the intersection of Dante Drive and Waterton Road in the Roxborough area. The attached vicinity map, zoning map, and aerial map highlight site location and existing conditions.

E. Project Description

DWSD proposes to refurbish and expand the Chatfield Basin Water Reclamation Facility (CBWRF). The improvements will allow the existing system to increase treatment capacity from 0.6 million gallons per day to 0.9 million gallon per day and incorporate treatment systems to produce higher quality effluent. No physical changes are proposed to the existing off-site discharge point.

The project includes two new metal pre-fabricated buildings; a 6,300-square-foot building for a membrane bioreactor and a 1,500-square-foot building for a fine screening area. Existing buildings will be refurbished, but the existing footprints are not expected to be expanded.

The site will be accessed via an improved gravel driveway connection to Caretaker Road. Additional site improvements include internal gravel drive and parking areas, grading, and stormwater management. An existing stormwater detention system will be retained and refurbished. The project will have exterior lighting for access and buildings. All exterior lighting will be required to comply with the Douglas County Zoning Resolution.

The applicant has proposed to mitigate odors with odor control systems. Noise impacts will be mitigated by enclosing the aeration blower in the proposed 6,300-square-foot building.

Construction is anticipated to begin with partial demolition of an aeration basin in October 2025. Most construction activities are planned to start in January 2026, with peak activity in Spring of 2026 with completion anticipated before the end of 2027. Construction is anticipated to be scheduled on weekdays from 6:00 a.m. to 5:00 p.m. During construction, approximately 22 workers will be on the site. During construction, equipment including a crane, concrete pump trucks, and forklifts will be delivered to the site. Post construction, four employees will be on site seven days a week with occasional deliveries to the site.

The project is located within the Pike National Forest Nonurban Subarea as identified by the Douglas County Comprehensive Master Plan 2040 (CMP) Section 3. Policy 3-3I.2 is to minimize the impact of development and respect the distinct character of the

Pike National Forest during development review. This project consists of upgrades to an existing wastewater treatment facility site.

III. CONTEXT

A. Background

The CBWRF was previously owned by the Roxborough Water and Sanitation District (RWSD) and was decommissioned in 2010. DWSD purchased the site with the intention of refurbishing and expanding the facility to provide service to Sterling Ranch and other customers within its service area.

B. Adjacent Land Uses and Zoning

Adjacent properties include the High Line Canal, vacant properties, and a roadway tract.

Zoning and Land Use

Direction	Zoning	Land Use		
North	River Canyon Planned Development	Roadway tract and vacant		
	and General Industrial			
South	Agricultural One	High Line Canal		
East	River Canyon Planned Development	Vacant		
	and General Industrial			
West	River Canyon Planned Development	Vacant		
	and General Industrial			

IV. PHYSICAL SITE CHARACTERISTICS

A. Site Characteristics and Constraints

The site is developed with an existing, decommissioned wastewater treatment facility. There is 100-year floodplain along the eastern property line.

B. Access

Access to the site will be via an existing driveway from Caretaker Road. The applicant proposes to refurbish the driveway with gravel.

D. Drainage and Erosion

The applicant provided a drainage report for review and has proposed to use and refurbish an existing detention ponds. Engineering had not yet responded to the referral request at the writing of this staff report. Approval of any necessary plans and permits including GESC and construction plans will be required prior to commencement of construction.

E. Floodplain

There is 100-year floodplain located along the eastern property line. Douglas County Engineering will review the project for any potential impacts and had not yet

responded to the referral request at the writing of this staff report. If any floodplain permits are necessary, approval of these will be required prior to commencement of construction.

V. PROVISION OF SERVICES

A. Schools

This is a nonresidential project that will not impact school services.

B. Fire Protection

West Metro Fire Protection District (WMFD) provides fire and emergency services for the site. A referral request was also sent to South Metro Fire Rescue (SMFR) who may also provide services within the area. At the writing of this staff report, WMFD and SMFR had not provided a response to the application. The applicant will be required to obtain any approvals or permits necessary from WMFD and SMFR prior to commencement of construction.

C. Sheriff Services

The Douglas County Sheriff's Office (DCSO) will provide police protection to the site. The Office of Emergency Management responded to the referral request with no comment. At the writing of this staff report, responses had not been received from E911 or DCSO.

D. Water and Sanitation

The purpose of the project is to provide wastewater services to nearby communities including Sterling Ranch, the Range, and Louviers.

E. Utilities

Area utility service providers were provided a referral on this application. CORE Electric Cooperative responded to the referral request that the project is outside of their service area. At the writing of this staff report, no other utility provider issued comments on the application.

F. Other Required Processes and Permits

In addition to the L & E approval, the following permits and other approvals may be required prior to commencement of construction:

- Engineering: Construction Drawings approval, GESC report and plans approval, approval of any other necessary plans and permits.
- Colorado Department of Public Health and Environment: Discharge permit, site application permit.
- Building Division: Building permits.
- West Metro Fire Department: Any necessary permits.
- South Metro Fire Department: Any necessary permits.

VI. Public Notice and Input

Courtesy notices of an application in progress were sent to adjacent property owners. At the preparation of the staff report, no members of the public had responded to the courtesy notices. Any comments received will be provided prior to the hearing. Referral response requests were sent to required referral agencies on September 19, 2025. Referral responses are due at the conclusion of the referral period on October 2, 2025, or prior to the Planning Commission Hearing.

Referral agency responses received to date are attached to the staff report for reference. The Chatfield Community Association provided a referral response with concerns that approving the project prior to CDPHE permits and discharge permits being finalized is premature and noted concerns about water quality due to proximity to the floodplain. Further responses received through the end of the referral period will be provided to the Planning Commission prior to the hearing and added to the project record.

VII. STAFF ASSESSMENT

Staff evaluated the application in accordance with Section 32 of the DCZR. Should the Planning Commission approve the L & E request, the applicant will be required to receive approval of all necessary permits prior to commencement of the project.

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Zoning Map	
Aerial Map	
Referral Agency Response Report	
Referral Response Letters	
Location and Extent Exhibit	



www.douglas.co.us

LAND USE APPLICATION

Please complete, sign, and date this application. Return it with the required items listed on the Submittal Checklist to planningsubmittals@douglas.co.us. Submittals may also be mailed or submitted in person to Planning Services. NOTE: The Planning Commission or the Board of County Commissioners should not be contacted regarding an open application.

OFFICE USE ONLY PROJECT TITLE: River Canyon Filing 2, 3rd Amendment, Lot 2A-1				
PROJECT NUMBER: LE2025-018				
PROJECT TYPE: Location and Extents				
MARKETING NAME: Chatfield Basin Water Reclamation Facility Refurbishment				
PRESUBMITTAL REVIEW PROJECT NUMBER: PS2024-215 (updated from PS2023-126)				
PROJECT SITE: Address: 11310 Caretaker Road, Littleton, CO 80125				
State Parcel Number(s): 2227-344-05-001				
Subdivision/Block#/Lot# (if platted): River Canyon Filing 2, 3rd AMD, Lot 2A-1				
PROPERTY OWNER(S): Name(s): Dominion Water & Sanitation District Address: 9250 E Costilla Avenue, Greenwood Village, CO 80012 Phone: (720) 556-6840 Email: andrea.cole@dominionwsd.com				
AUTHORIZED REPRESENTATIVE: (Notarized Letter of Authorization is required from the property owner, unless the owner is acting as the representative) Name: Matt Padgett Address: 9250 E Costilla Avenue, Greenwood Village, CO 80012 Phone: (720) 446-9141 Email: matt.padgett@dominionwsd.com				
To the best of my knowledge, the information contained on this application is true and correct. I have received the County's information sheet regarding the <i>Preble's Meadow Jumping Mouse</i> . —Signed by:				

August 25, 2025

Date

-067109D22B52400.... Applicant Signature-Matthew Padgett



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PREBLE'S MEADOW JUMPING MOUSE

What is the Preble's Meadow Jumping Mouse?

The Preble's Meadow Jumping Mouse is a rare mouse designated by the United States Fish and Wildlife Service as a "threatened species" under the Endangered Species Act. The federal threatened species designation prohibits the unlawful "take" of the Preble's Meadow Jumping Mouse or its habitat.

Where does the mouse live?

The Preble's Meadow Jumping Mouse lives primarily in heavily vegetated riparian habitats. In Douglas County, the mouse has been located in or near many drainages, including tributaries and the mainstream reaches of East and West Plum Creek. However, any stream reach or potential habitat within Douglas County may be subject to the requirements of the Endangered Species Act. The mouse has also been found in Boulder, Elbert, El Paso, Jefferson, and Larimer counties and in parts of Wyoming.

What activities may be considered a violation of the Endangered Species Act?

In its listing decision, the United States Fish and Wildlife Service identified activities that may result in violation of the Endangered Species Act to include:

- 1. Unauthorized or unpermitted collection, handling, harassing, or taking of the species;
- 2. Activities that directly or indirectly result in the actual death or injury death of the mouse, or that modify the known habitat of the species, thereby significantly modifying essential behavioral patterns (e.g., plowing, mowing, or cutting; conversion of wet meadow or riparian habitats to residential, commercial, industrial, recreational areas, or cropland; overgrazing; road and trail construction; water development or impoundment; mineral extraction or processing; off-highway vehicle use; and, hazardous material cleanup or bioremediation); and:
- 3. The application or discharge of agrichemicals or other pollutants and pesticides onto plants, soil, ground water, or other surfaces in violation of label directions or any use following Service notification that such use, application or discharge is likely to harm the species; would be evidence of unauthorized use, application or discharge.

How to determine if a proposed activity would violate the Endangered Species Act.

Any questions regarding whether an activity will impact the Preble's Meadow Jumping Mouse or its habitat should be directed to:

Field Office Supervisor USFWS Colorado ES Field Office (MS 65412) Denver Federal Center PO Box 25486 Denver, CO 80225-0486 303-236-4773 ColoradoES@fws.gov

Where to find more information on the Preble's Meadow Jumping Mouse.

More information can be found at the US Fish and Wildlife Service website at: https://ecos.fws.gov/ecp/species/4090

Any approval given by Douglas County does not obviate the need to comply with applicable federal, state, or local laws and/or regulations.

Stantec Consulting Services Inc.

Location and Extents Report – Chatfield Basin Water Reclamation Facility

Douglas County, Colorado



Prepared for: Douglas County

Prepared by: Dominion Water & Sanitation District & Stantec Consulting Services Inc. August 26, 2025

Project/File: 181301899

Revision Schedule

Revision	Description	Author	Date	Independent Review	Date
0	For Approval	S. Cihelka	8/18/2025	M. Reimann	8/20/25

Disclaimer

The conclusions in the Report titled Location and Extents Report - Douglas County are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from Dominion Water & Sanitation District (the "Client") and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

Prepared by:	hllf.
	Signature
	Susan Cihelka
Reviewed by:	Sato
	Anni Santos
Approved by:	Metty C. Things
	Signature
	Matt Reimann, PE
	Printed Name

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Engineer's Letter

August 26, 2025

Douglas County
Department of Community Development – Planning Services
100 Third Street,
Castle Rock, CO 80104

RE: Dominion Water and Sanitation District - Chatfield Basin Water Reclamation Facility
Refurbishment and Expansion Location & Extents Planning and Engineering Review Application
(PS2024-215 – River Canyon #2-3rd Amendment – Lot 2A-1)

To Whom It May Concern,

Dominion Water and Sanitation District (DWSD) requests for Douglas County to review and approve the Location and Extents Permit Application for the refurbishment and expansion of Chatfield Basin Water Reclamation Facility (CBWRF). On behalf of DWSD, Stantec Consulting Services Inc. (Stantec) has prepared the requested documents from the Pre-Submittal Review (PS2024-215, updated from PS2023-126) meeting held on October 17, 2024. The Grading Erosion and Sedimentation Control (GESC) Permit Application, Preliminary Plan and Report have been submitted for concurrent review is preliminary and grading and elevations may change as design progresses.

This is a progressive design-build project, in which Stantec is serving as the designer, with PCL Construction, Inc. (PCL) serving as the contractor for the detailed design and construction of the project. This project is broken into four (4) work packages to streamline the design and construction process.

- Work Package 1 (WP1) includes partial demolition of the Aeration Basin structure above ground and refurbishment of concrete structure below grade. WP1 will also include temporary equalization bypass modifications for the Roxborough Water Sanitation District (RWSD) Lift Station. The demolition permit is being completed separately by the demolition sub-contractor. A Small Utilities GESC was submitted for review to Douglas County on August 21, 2025.
- Work Package 2 (WP2) is for early procurement of long-lead equipment and does not involve any construction activity.
- Work Package 3 (WP3) consists of the civil grading, stormwater management, buried utilities and any other work not associated with new or existing structures on the site. It also includes partial demolition inside existing structures in preparation for the new work under Work Package 4.
- Work Package 4 (WP4) consists all of the new work associated with the refurbishment project across all new and existing structures. This includes upgrading fixtures and utility connections and installation of two new pre-engineered metal buildings for new wastewater treatment processes and installation of a new enclosed internal power distribution housing.



Location and Extents Report - Douglas County

Metern C. Reinn

Engineer's Letter

A more detailed outline of the proposed treatment and site improvements are provided in the Project Narrative of this report.

DWSD appreciates the County's input and guidance in support of this Project. If you have any questions or require additional information, please contact me.

Respectfully,

Matthew Reimann, P.E.

Project Manager

C: (720) 365-9396

E: Matthew.Reimann@Stantec.com

CC:

Pamela Grover

Dominion WSD

(303) 325-6457

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Acronyms / Abbreviations

Acronym / Abbreviation	Full Name			
CBWRF	Chatfield Basin Water Reclamation Facility			
CDPHE	Colorado Department of Public Health and Environment			
DWSD	Dominion Water Sanitation District			
EDB	Extended Detention Basin			
GESC	Grading, Erosion, and Sediment Control			
MBR-AS	Membrane Bioreactor Activated Sludge			
mgd	Million Gallons per Day			
RWSD	Roxborough Water Sanitation District			
SPRWRRF	South Platte Renew Water Resource Recovery Facility			
WQCC	Water Quality Control Commission			



1 Project Narrative

On behalf of Dominion Water & Sanitation District (DWSD), Stantec has prepared the project narrative in accordance with the Location and Extent submission to Douglas County for the proposed refurbishment and expansion of Chatfield Basin Water Reclamation Facility (CBWRF), located in Littleton, Douglas County, Colorado to provide wastewater treatment and surface water discharge to the South Platte River. In addition to typical wastewater effluent criteria stipulated by the Colorado Department of Public Health and Environment (CDPHE). The expansion of the wastewater treatment facility will provide Sterling Ranch, The Range, and Louvier communities with reliable wastewater services. Louvier is a small, unincorporated community in Douglas County that currently does not have reliable water or wastewater services.

CBWRF is owned and operated by DWSD, formerly owned by Roxborough Water and Sanitation District (RWSD). It was decommissioned prior to 2010 and was replaced with a lift station. The lift station conveys wastewater to a City of Littleton interceptor, which eventually flows into the South Platte Renew Water Resource Recovery Facility (SPRWRRF) for treatment. DWSD purchased the abandoned CBWRF from RWSD with the intention of refurbishing and expanding the facility to provide wastewater treatment.

The discharge easement was purchased by DWSD at the time of purchase of the wastewater treatment facility. The agreement requires the easement to be assigned to DWSD by Denver Water. DWSD is still working toward this assignment. In addition to the discharge easement, an easement with Xcel also exists for the utility power feed for the site.

The CBWRF has an existing discharge permit (CO0041645, administratively extended in May 2016) for 0.6 MGD which will allow for discharge to the South Platte River. A permit modification has been filed with the Colorado Department of Public Health and Environment (CDPHE), Water Quality Control Commission (WQCC) to expand the discharge permit to 0.9 MGD. The permit modification will be secured prior to the plant exceeding 0.6 MGD capacity. In addition, the site application has been filed with CDPHE and is currently under review. Other necessary permits will be submitted later during the course of design as needed.

This is a design-build project that will expand the existing wastewater treatment capacity of CBWRF, in which Stantec Consulting Services Inc. (Stantec) is serving as the designer, with PCL Construction, Inc. (PCL) serving as the contractor for the detailed design and construction of the project, which is broken into four (4) work packages to streamline the design and construction process.

- Work Package 1 includes partial demolition of the Aeration Basin structure and temporary
 equalization bypass modifications for the Roxborough Water Sanitation District (RWSD) Lift
 Station. The partial demotion includes removing the walls and roof while leaving the below-grade
 tankage intact. The CMU walls are in poor structural condition, however the concrete structure
 below grade is in good condition and will be refurbished. The demolition permit is being
 completed separately by the demolition sub-contractor.
- Work Package 2 is for early procurement of long-lead equipment and does not involve any construction activity.

Location and Extents Report - Douglas County Chatfield Basin WRF Refurbishment

- Work Package 3 consists of the civil grading, stormwater management, buried utilities and any other work not associated with new or existing structures on the site. It also includes partial demolition inside existing structures in preparation for the new work under Work Package 4. This includes demolition of existing HVAC equipment, electrical and mechanical equipment along with minor structure and architectural work such as removing knockout panels, roofing membranes and corroded metal doors.
- Work Package 4 consists all of the new work associated with the refurbishment project across all
 new and existing structures. This includes installation of new roofing, doors, electrical, plumbing,
 HVAC and mechanical equipment in the existing structures, two new pre-engineered metal
 buildings for new wastewater treatment processes and installation of a new "E-House" which is a
 pre-fabricated enclosure housing switchboards that distribute utility power across the site.

The existing wastewater treatment process at the CBWRF consisted of coarse screening and aerated grit removal, conventional activated sludge biological nutrient removal supplemented with chemical phosphorus removal, secondary clarifier, and disinfection with sodium hypochlorite before release into the South Platte River. Waste solids were aerobically digested before either wet sludge hauling or drying before final disposal. The facility has been out of service for over a decade and the proposed improvements consist of re-using or re-purposing all hydraulic structures on the site while replacing the mechanical equipment and adding two new treatment processes/buildings to meet expected effluent discharge limits.

The proposed improvements will update the existing wastewater treatment system to increase the treatment capacity of the plant from 0.6 million gallons per day (mgd) to 0.9 mgd, while producing higher quality effluent. The following existing buildings will be refurbished and feature utility enhancements, but the building's existing footprint are not to be expanded: Headworks (Area 10), Biological Nutrient Removal (BNR) (Area 20), Equalization Tank (Area 18, re-purposed aerobic digester), Chlorine Contact Tank and Chemical Storage (Area 80). The proposed prefabricated Electrical Utility Room (E-House) and transformer will be placed on the site of the existing Aeration Basin Blower Room. Proposed new building additions will include a Fine Screening (Area 15) – 1,500-sqft building, Membrane Bioreactor (Area 30) – 6,300-sqft and installation of a packaged odor control system (Area 70) will mitigate odors stemming from the untreated wastewater around the primary treatment and flow equalization processes. The odor control system servicing the influent splitter structure and Areas 10, 15 & 18 will treat foul air and ferric chloride dosing will also reduce the amount of hydrogen sulfide produced. The aeration blowers will be located inside the new Area 30 building to mitigate noise pollution, with the discharge air piping passing over to the Area 20 BNR tanks. A Backup Generator to support wastewater treatment efforts during emergency outages. The proposed Locations & Extents Plan Exhibit is included in (**Appendix A**).

The existing preliminary treatment system is to retain and refurbish the existing headworks building to include pre-screening and grit removal upstream of a new Fine Screening building. The existing secondary bioreactor basins and clarifiers will be converted to a Membrane Bioreactor – Activated Sludge (MBR-AS) process tankage to provide high-quality effluent. The mixed liquor will be pumped into a pre-fabricated MBR tank where the membrane permeate will be sent for disinfection before final outfall. The existing chemical storage and pumping and piping facilities will be replaced in the existing chemical building with the addition of a supplemental carbon source feed system to enhance nitrate removal.

CBWRF is a private facility, and public improvements will be minimal. All proposed improvements will be contained on the project site. Site improvements will feature exterior lighting to new proposed buildings, and concrete pads at the access points. A pole-mounted light will be added adjacent to the Electrical Transformers and Backup Generators to provide visibility to facility staff. Other project improvements will include utilizing site lighting that seeks to minimize light pollution while providing a safe working environment for DWSD personnel. All proposed exterior lighting will conform to Douglas County's Zoning Resolution standards as detailed in Section 30. No landscaping, parking lots, paved sidewalks will be added on site. The existing gravel lot will be restored post construction. The access driveway through the site will also allow for large delivery vehicles to navigate the site without having to reverse.

This project was developed in compliance with the Comprehensive Master Plan for Douglas County.

2 Location and Extents Report

2.1 Community Impact Report

The objective of this project is to refurbish and expand the existing wastewater treatment capacity of Chatfield Basin Water Reclamation Facility. The expansion of the treatment facility will provide the communities of Sterling Ranch and Louviers more stable wastewater treatment while providing critical infrastructure to support the continued development of the Sterling Ranch Subdivision and ensure development occurs concurrently with necessary services and infrastructure.

Stormwater Detention is currently provided and the improvements proposed in this project will retain and improve them to continue treating stormwater runoff as required by the County. To reduce runoff, paved surfaces will be kept to a minimum and will be limited to landings adjacent doorways for foot and vehicle access.

2.2 Drainage Improvements

The proposed site improvements will result in an overall increase in the impervious area draining to the South Platte River. The existing stormwater detention system, permitted in 2008 was designed to accommodate 100-year design flows will be retained, and overall drainage patterns within the site will change minimally. Proposed improvements to the project site will restore the existing contours and raise the top of the bank six inches to restore the grade to meet the original permit for the Storm Water Detention Basin. A channel will be created to connect Basins 5 and 6 to flow into the overflow pond. The Phase III Drainage Report and Appendices (**Appendix C** of the GESC Report) lays out additional details how the runoff generated from the increased impervious area will be accommodated with the existing permitted system with minimal modifications. The Phase III Drainage Report is in accordance with the requirements of the Douglas County Storm Drainage and Design and Technical Criteria Manual, as required.

2.3 Traffic Impact

Existing and future traffic conditions are anticipated to have nominal impacts to future traffic or roadway infrastructure outside construction, with 12 trips per hour projected as the maximum total peak hour trips occurring in future conditions. During peak construction (March 2026), there will be increased traffic due to construction workers and facility operators accessing the project site. The maximum total peak hour number of trips is anticipated to be 38 trips per hour peak construction. No lane closures are anticipated as part of this project. A traffic narrative is included as **Appendix C**.

2.4 Stormwater Quality Recommendations

Douglas County requires post-construction control measures to prevent or reduce the discharge of pollutants into Douglas County's storm drain system. To satisfy this requirement, the configuration of new impervious areas are being proposed to (1) minimize directly connected impervious area by allowing for pervious areas to receive runoff from unconnected impervious areas before the extended detention basin (EDB) receives runoff, and (2) the proposed modifications to the existing EDB are intended to "Implement Control Measures with Water Quality Capture Volume with Slow Release" by designing the outfall control structure and pond volume for Full Spectrum Detention, with controlled release rates for the required Water Quality Capture Volume and 100-year detention volume, per Chapter 13 of the Douglas County Storm Drainage Design and Technical Criteria Manual.

2.5 Water Quality On Site

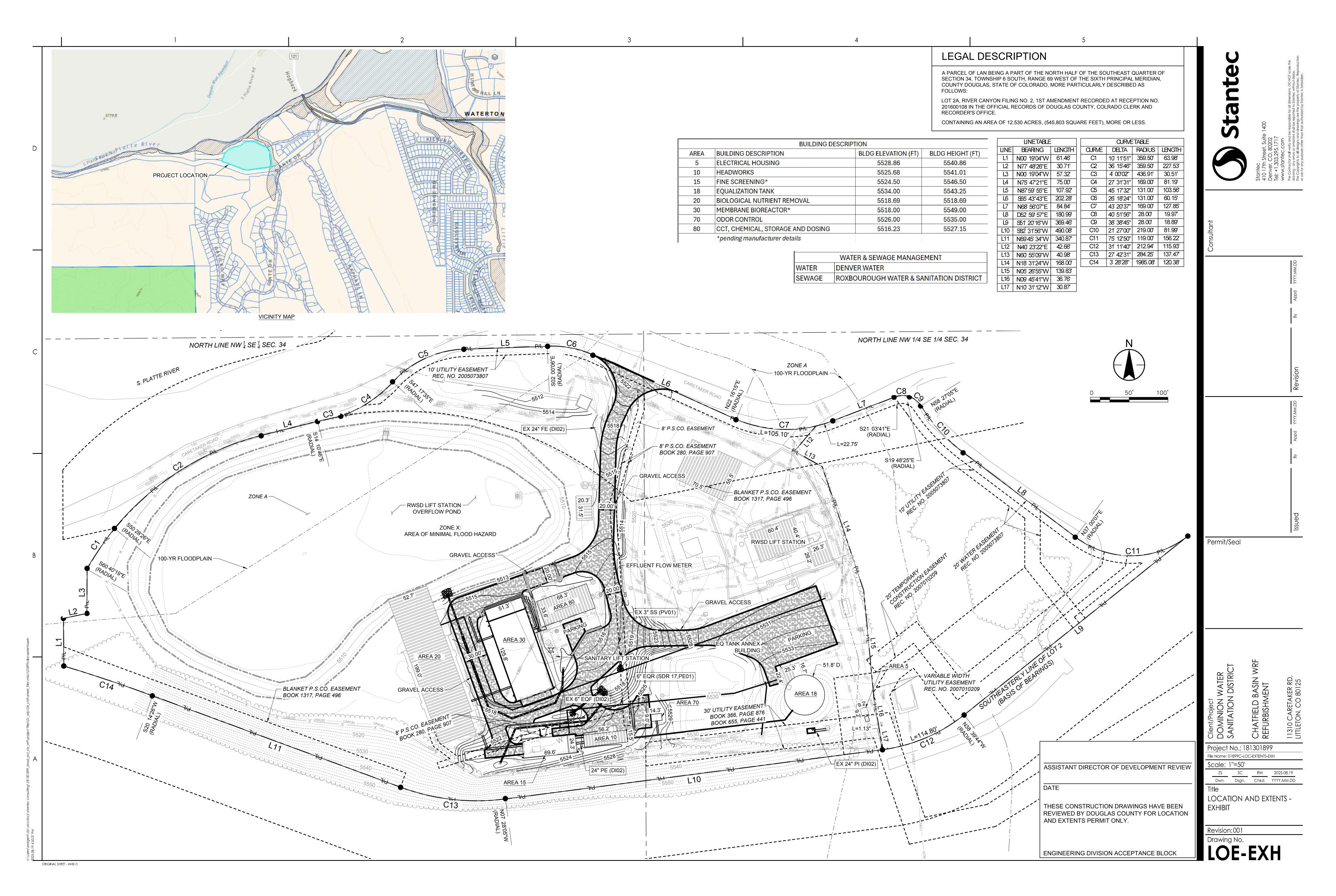
The Stormwater Detention and Infiltration Design Data Sheet for Chatfield Basin WRF (Facility ID: SWDF-20250619094037) was completed by Stantec and submitted to the Colorado Stormwater Council for review on June 19, 2025. The Stormwater Detention and Infiltration Design Data Sheet and submittal confirmation have been provided in **Appendix D**.

2.6 Construction Activities

Construction activities will be wide ranging within the existing site. Partial demolition of the aeration basin structure is scheduled to begin in October of 2025 and the main construction activities begin in January 2026, peaking in late spring 2026 for the structural work to construct the new building foundations and erect the new structures. Construction activities will continue through majority of 2027, wrapping up in the fall. Startup and commissioning are scheduled to be completed by the end of 2027. During the course of the construction, the work will take place on weekdays beginning October 2025 and be completed by December 2027. Construction activities will take place during construction hours 6:00am to 5:00pm, Monday through Friday to minimize noise pollution to neighboring properties. Any work conducted after hours would be considered special circumstances requiring work outside of normal hours as needed to relieve project constraints. A Grading, Erosion, and Sediment Control (GESC) Plan and report will be provided during the Engineering Services Review process.

Appendix A

Location & Extents Plan Exhibit



Location and Extents Report - Douglas County Chatfield Basin WRF Refurbishment

Appendix B

Construction Plan

CHATFIELD BASIN WATER RECLAMATION FACILITY REFURBISHMENT WORK PACKAGE 3 AUGUST 2025

SHEET	DRAWING NUMBER	DRAWING TITLE				
	L&E					
1	G-001	COVER				
2	G-002	ABBREVIATIONS				
3	G-003	SYMBOLS				
4	C-001	GENERAL NOTES AND SYMBOLS				
5	C-002	STANDARD DETAILS -I				
6	C-003	STANDARD DETAILS -I				
7	C-004	LOCATION CONTROL PLAN				
8	C-101	OVERALL SITE PLAN				
9	C-102	ENLARGED SITE PLAN - AREA 1				
10	C-103	ENLARGED SITE PLAN - AREA 2				
11	C-104	ENLARGED SITE PLAN - AREA 3				
12	CG-101	OVERALL GRADING PLAN				
13	CG-102	ENLARGED GRADING PLAN - AREA 1				
14	CG-103	ENLARGED GRADING PLAN - AREA 2				
15	CG-104	ENLARGED GRADING PLAN - AREA 3				
16	CU-101	OVERALL YARD PIPING KEYMAP				
17	CU-102	ENLARGED UTILITY PLAN AREA 1				
18	CU-103	ENLARGED UTILITY PLAN AREA 2				
19	C-202	PIPING PROFILES 1-3				
20	C-203	PIPING PROFILES 4-6				
21	C-204	PIPING PROFILE				
22	C-205	PIPING PROFILE				
23	C-207	PIPING PROFILE				
24	C-208	PIPING PROFILE				

CONTACT INFORMATION

<u>OWNER</u>

DOMINION WATER & SANITATION DISTRICT 9250 E COSTILLA AVE, GREENWOOD VILLAGE, CO 80112 ANDREA COLE (GENERAL MANAGER) EMAIL: ANDREA.COLE@DOMINIONWSD.COM) PHONE: (720) 556-6840 MATT PADGETT (CONSTRUCTION MANAGER) EMAIL: MATT.PADGETT@DOMINIONWSD.COM

ENGINEER

PHONE: (720) 446-9141

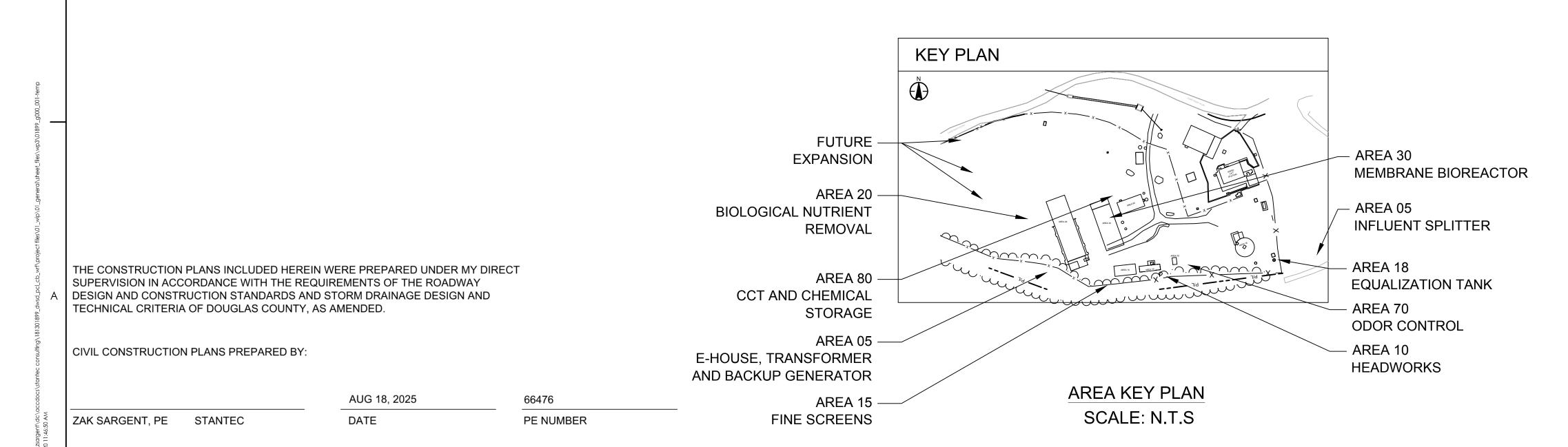
STANTEC CONSULTING SERVICES INC. 410 17TH ST, SUITE 1500, DENVER, CO 80022 MATTHEW REIMANN (PROJECT MANAGER) EMAIL: MATTHEW.REIMANN@STANTEC.COM PHONE: (520) 975-2727

CONTRACTOR

PCL CIVIL CONSTRUCTORS INC. 2000 S COLORADO BLVD, SUITE 2-500, DENVER, CO 80222 JEFF SCHEBLE (PROJECT MANAGER) EMAIL: JSCHEBLE@PCL.COM PHONE: (720) 840-3271



LOCATION PLAN SCALE: N.T.S



ASSISTANT DIRECTOR OF DEVELOPMENT REVIEW

THESE CONSTRUCTION DRAWINGS HAVE BEEN REVIEWED BY DOUGLAS COUNTY FOR LOCATION AND EXTENTS PERMIT ONLY.

ENGINEERING DIVISION ACCEPTANCE BLOCK

Permit/Seal

Project No.: 181301899

 KN
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 SRT
 2025.08.01

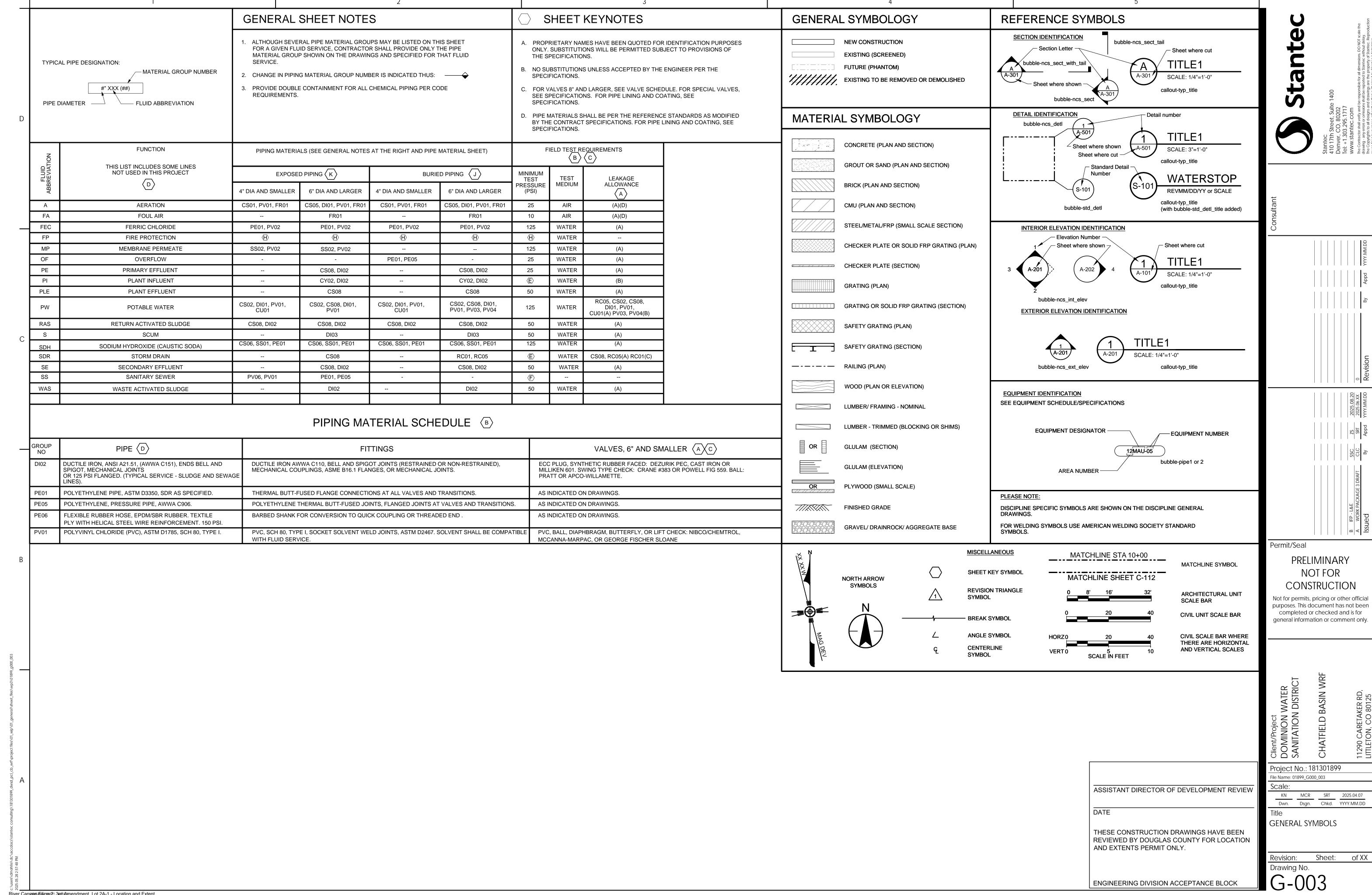
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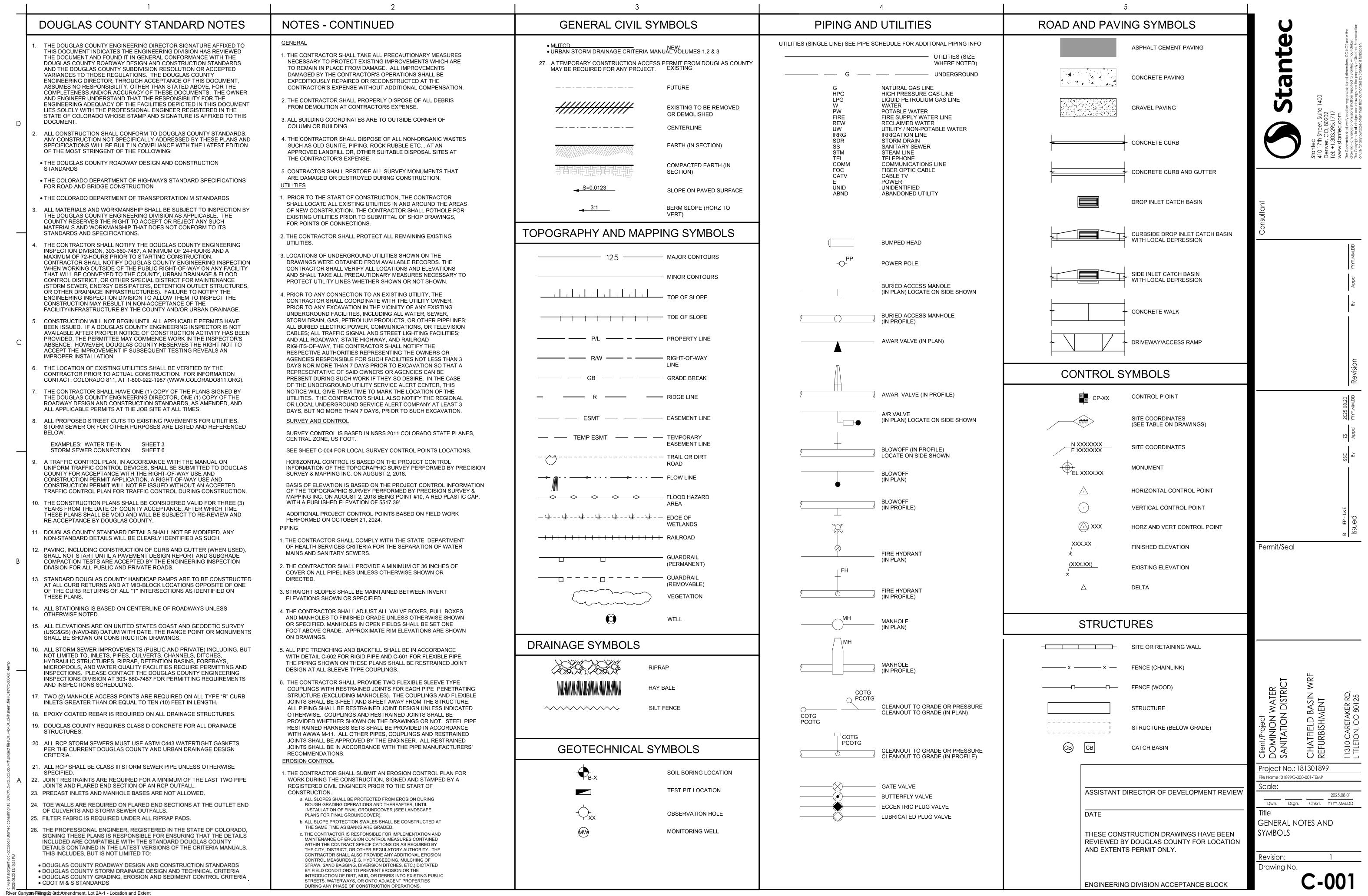
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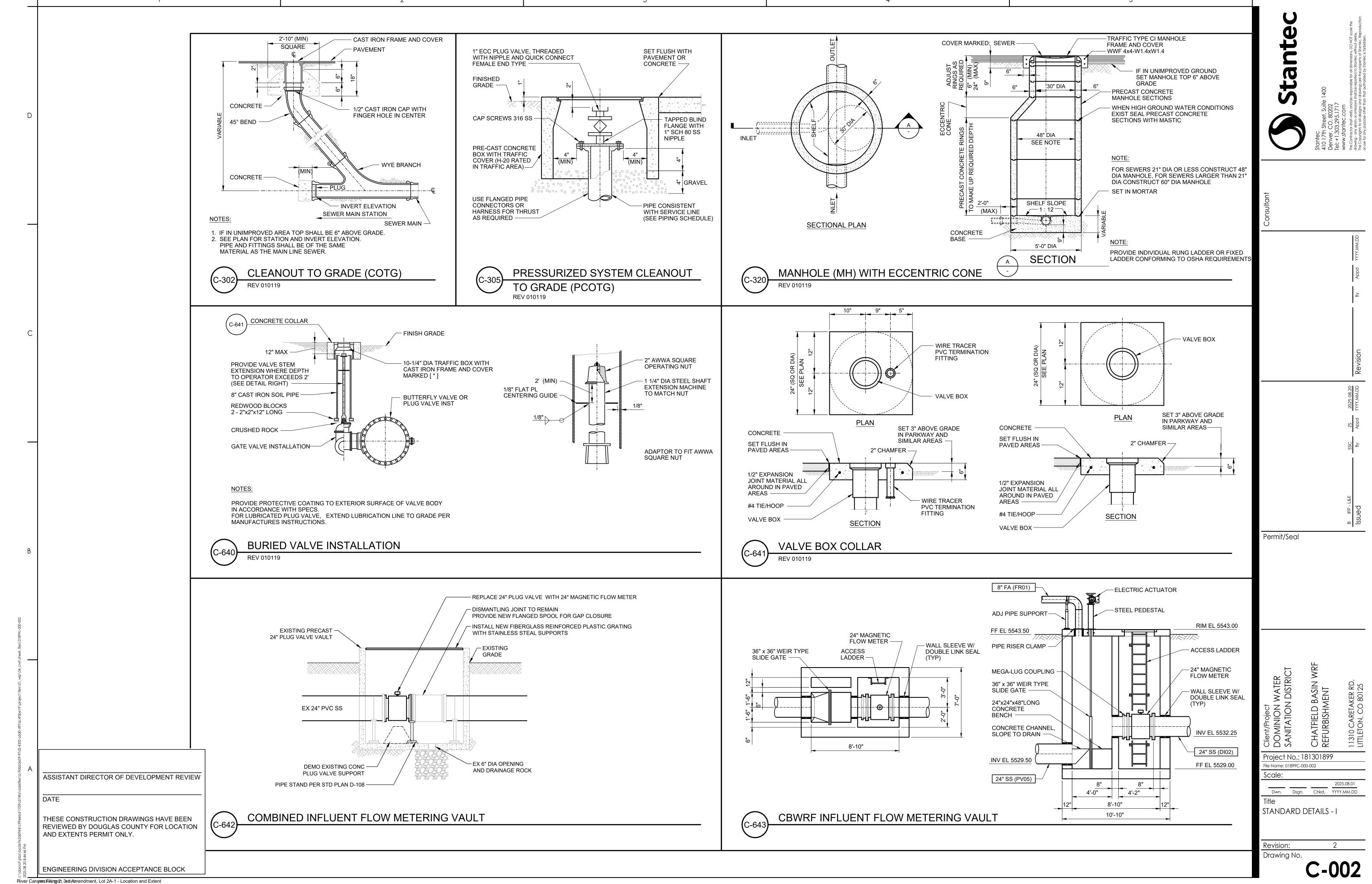
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River Cangons Riking 27 3rds Amendment, Lot 2A-1 - Location and Extent Project File # LE2025-018
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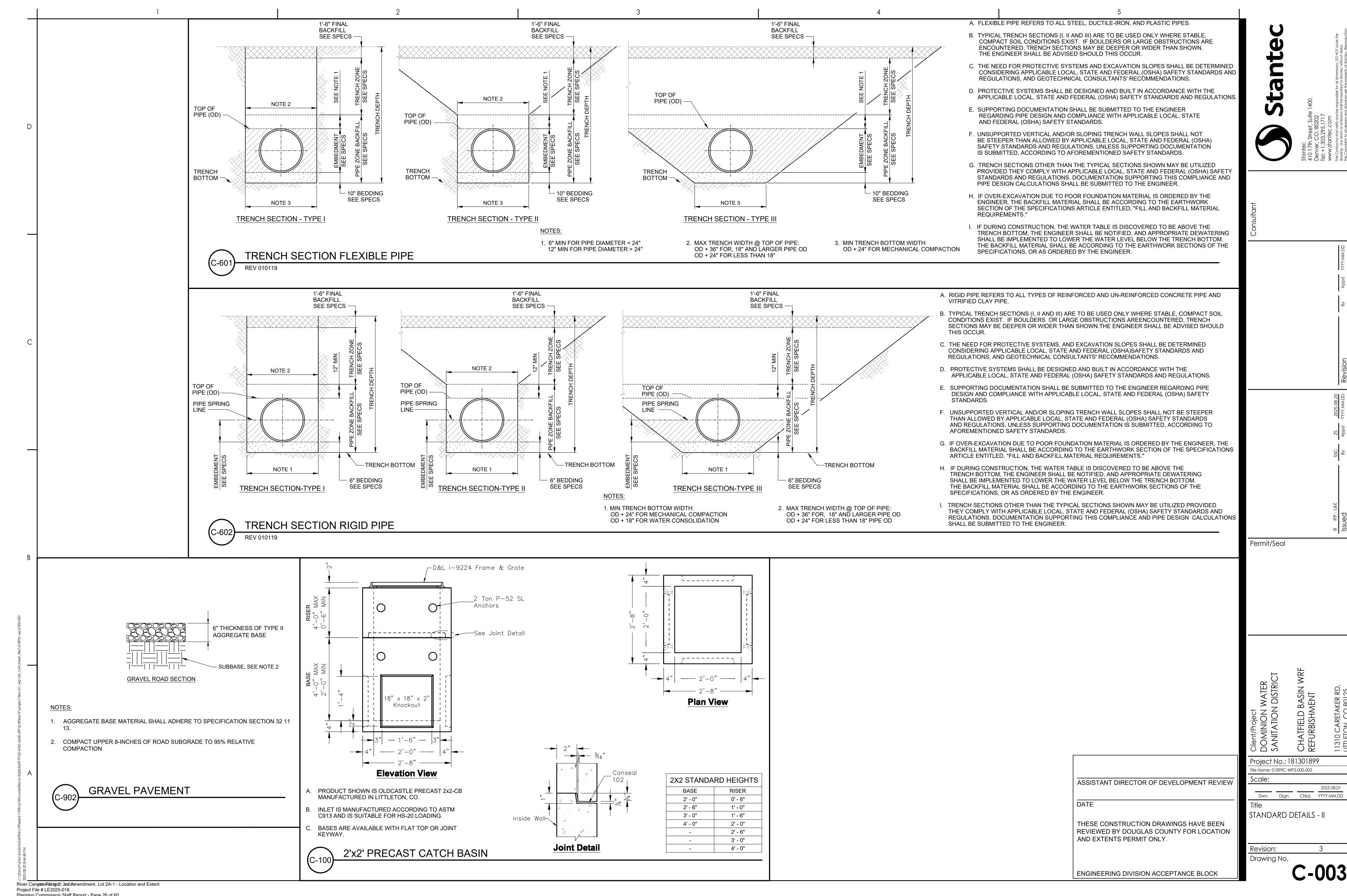


River Canyon Filing 27 3nd Amendment, Lot 2A-1 - Location and Extent Project File # LE2025-018
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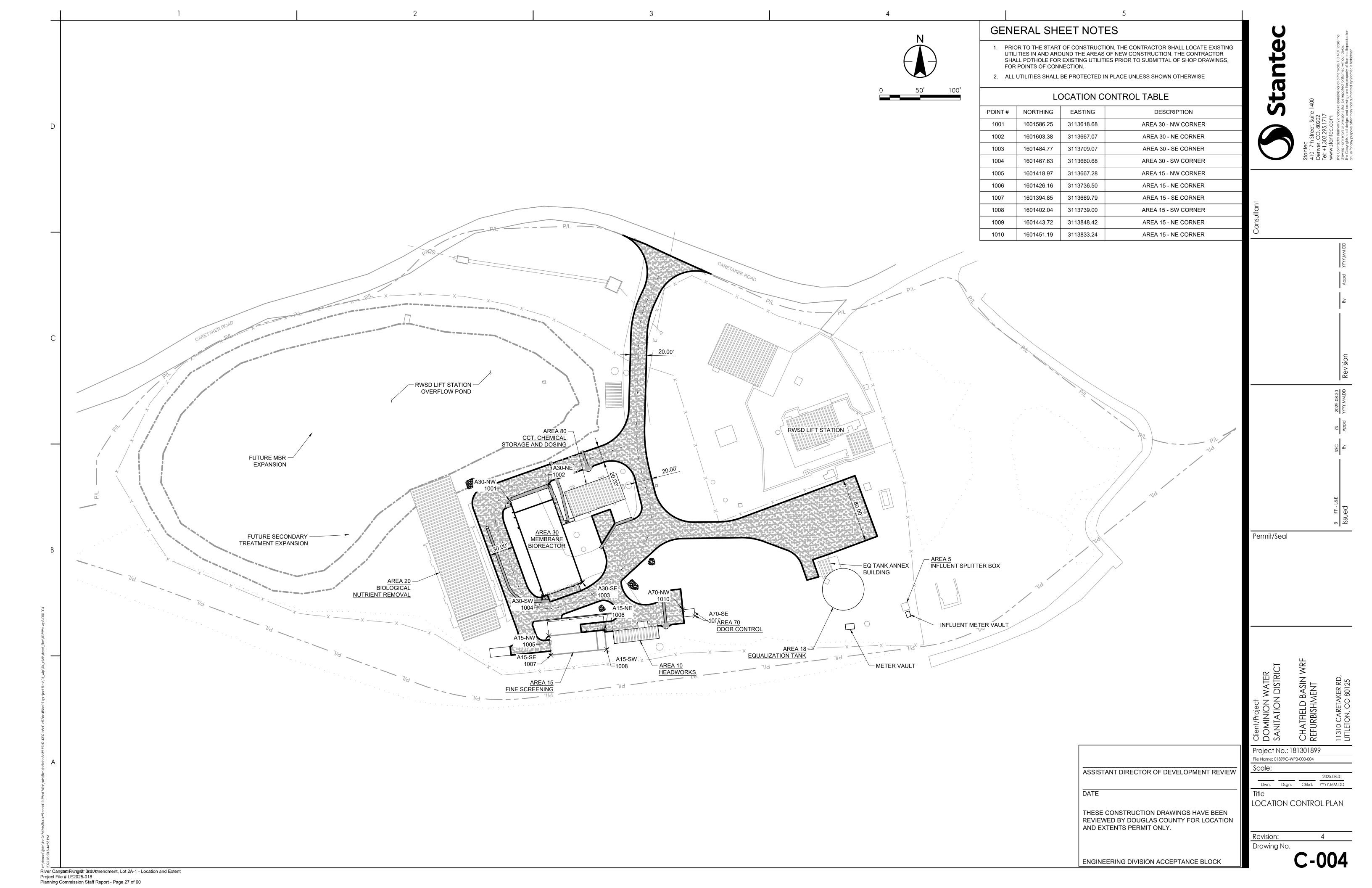


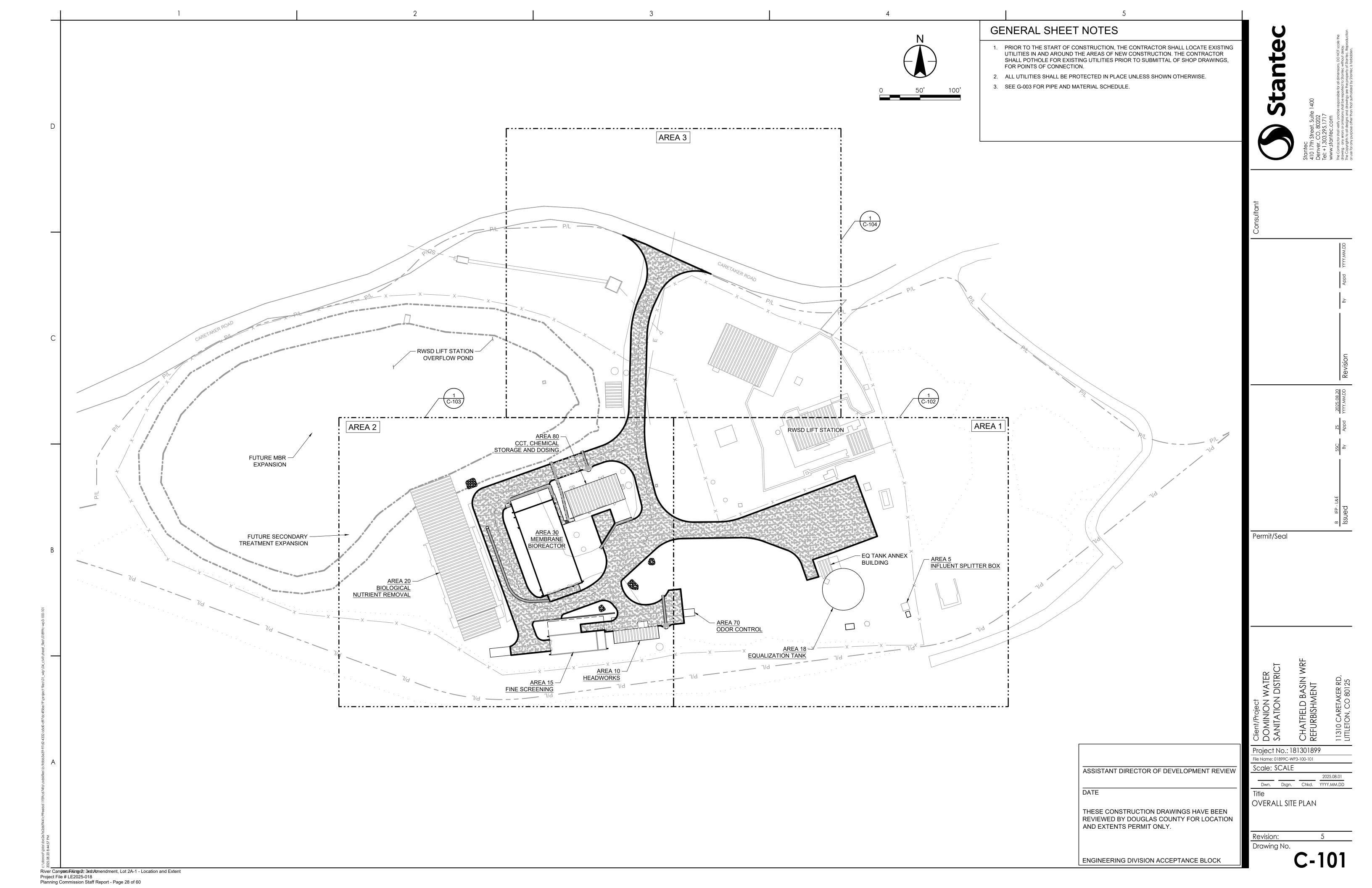


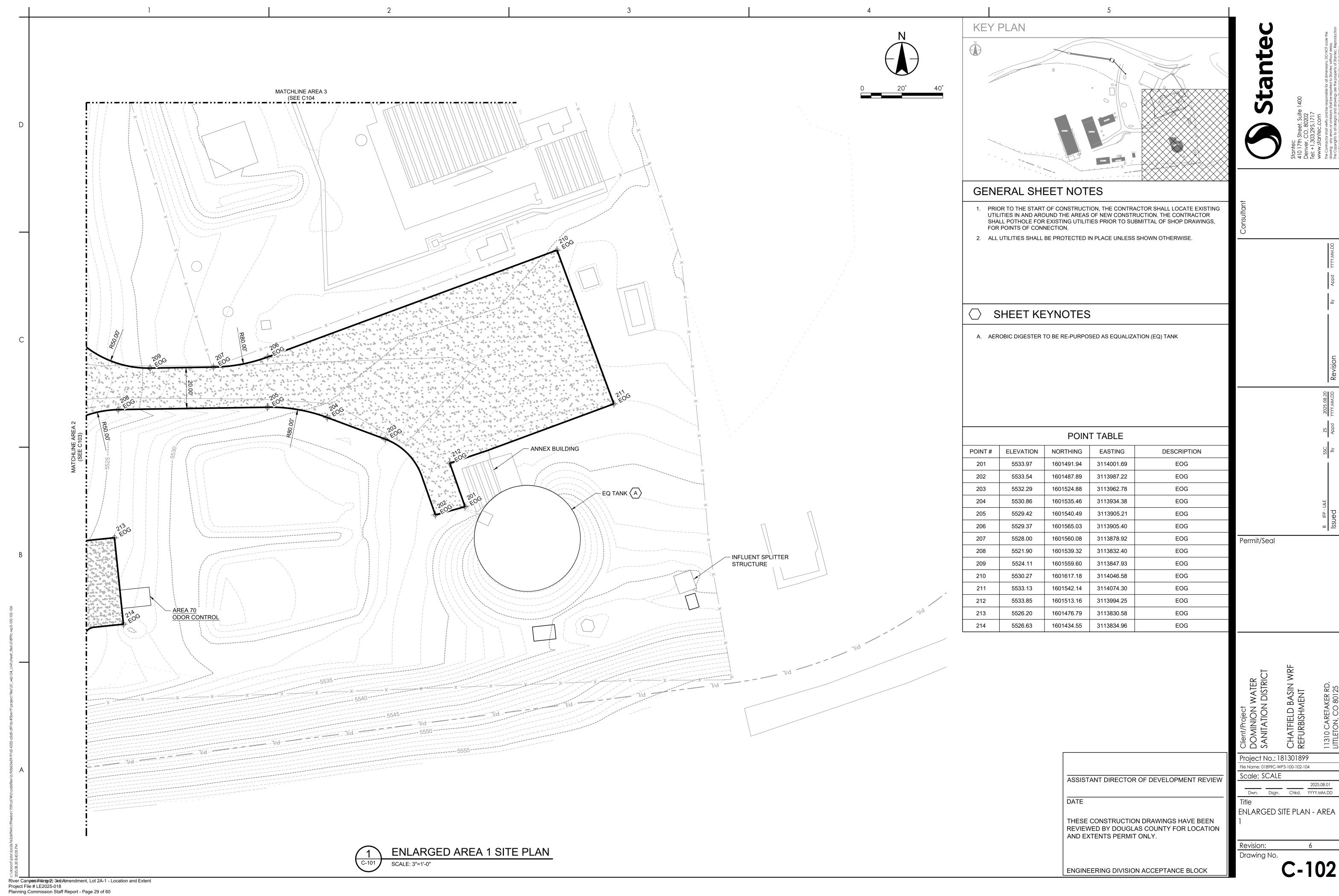
River Cangons Filling 27 3rd Amendment, Lot 2A-1 - Location a Project File # LE2025-018 Planning Commission Staff Report - Page 25 of 60

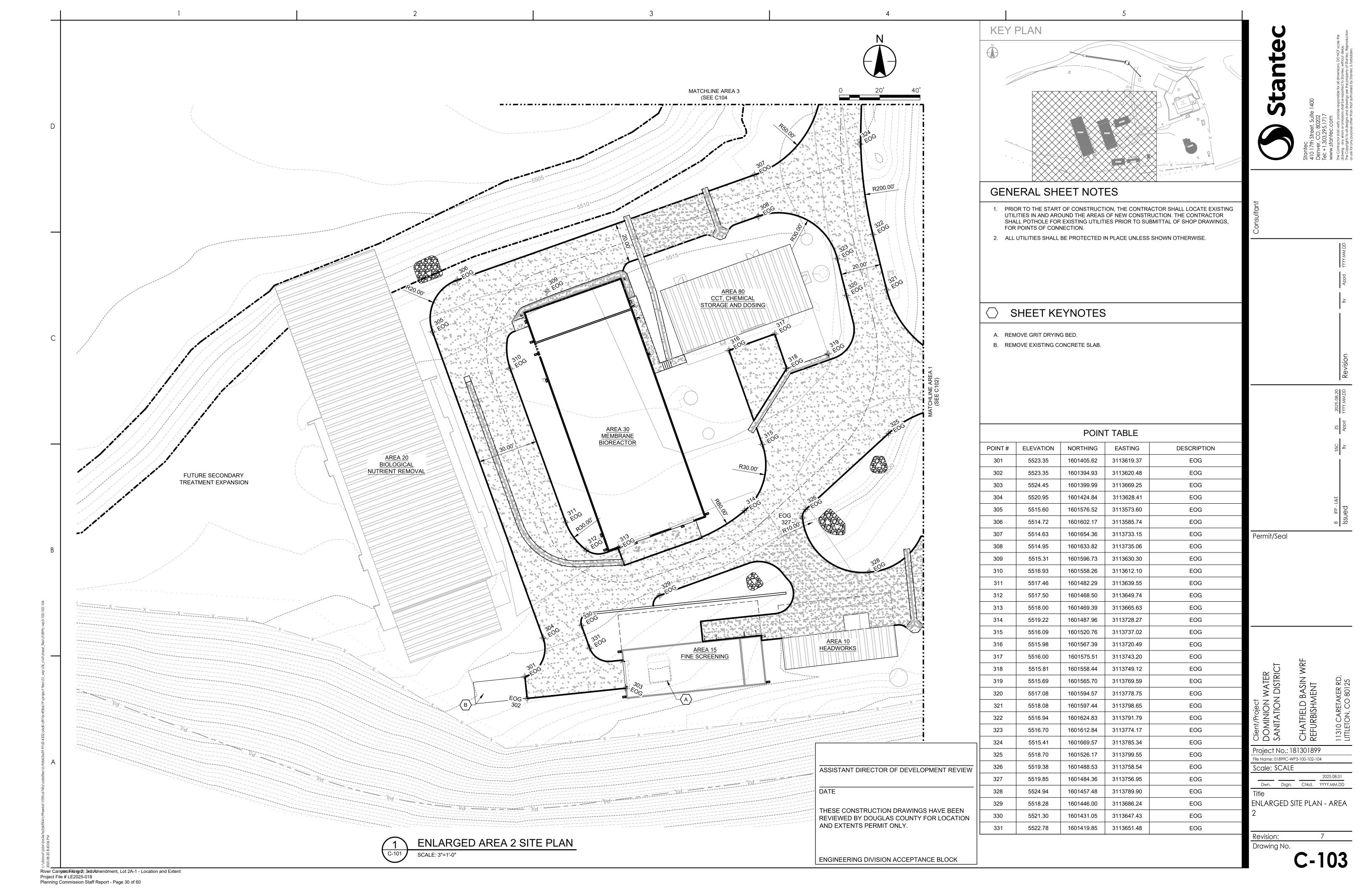


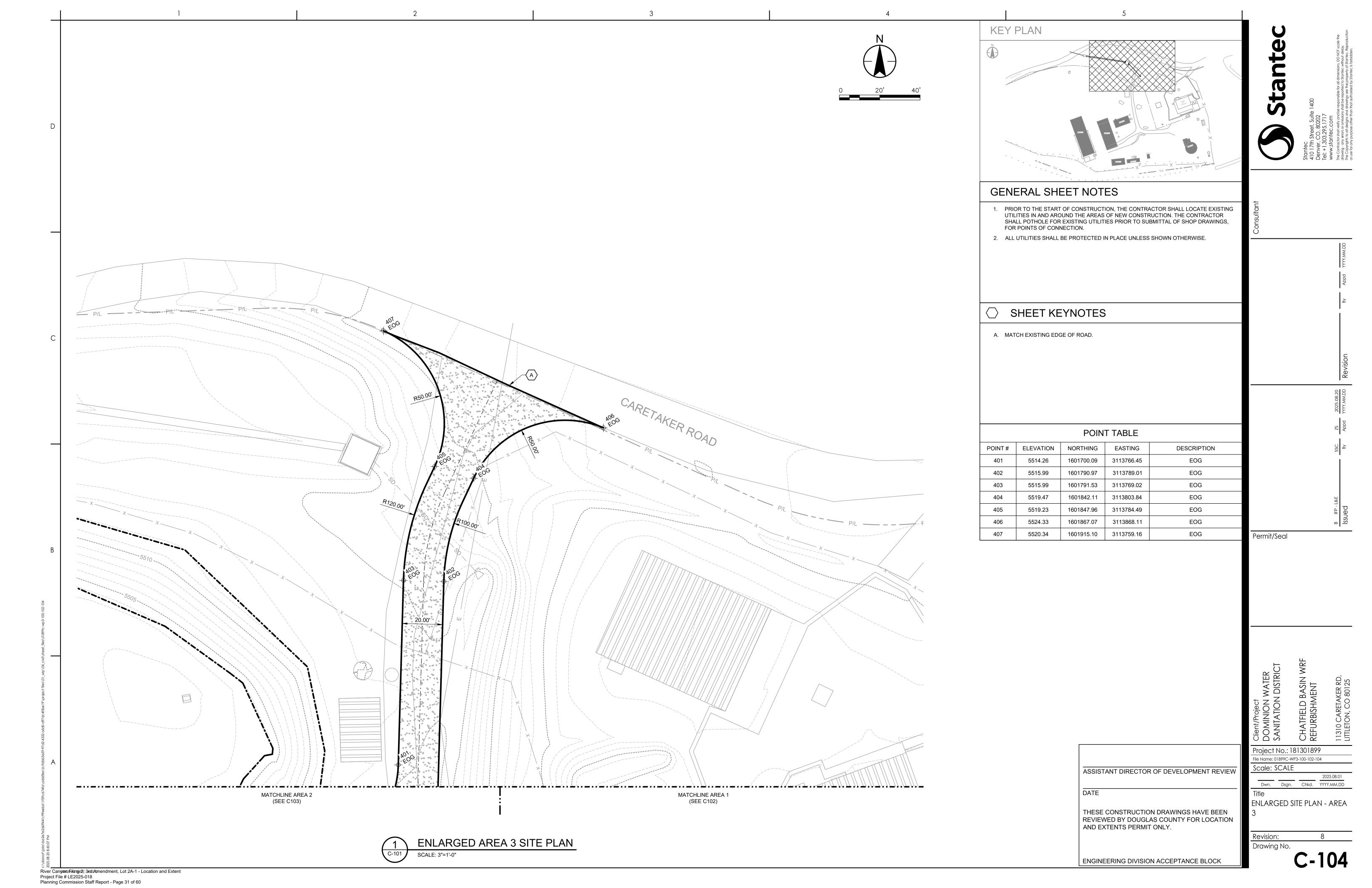
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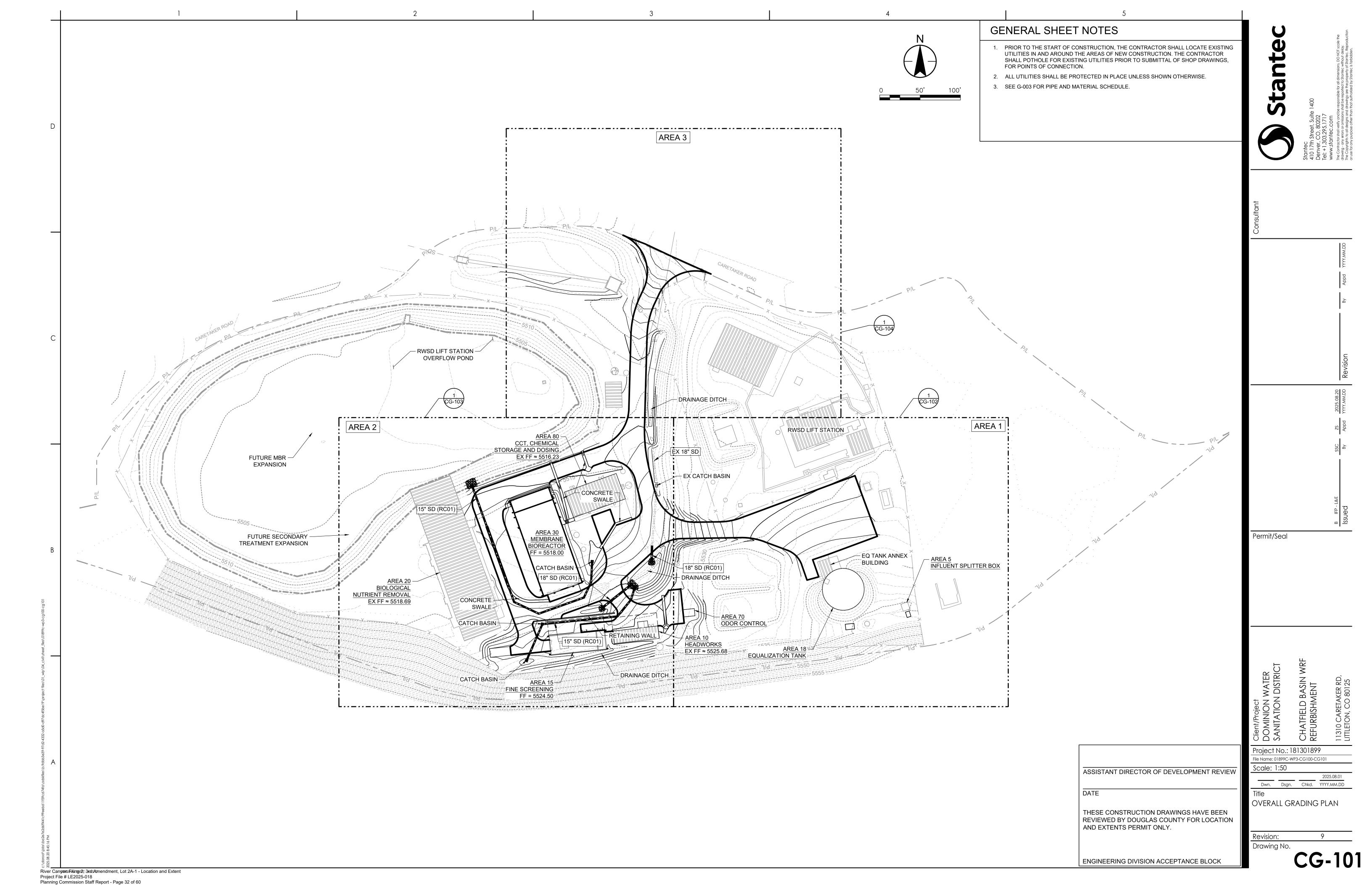


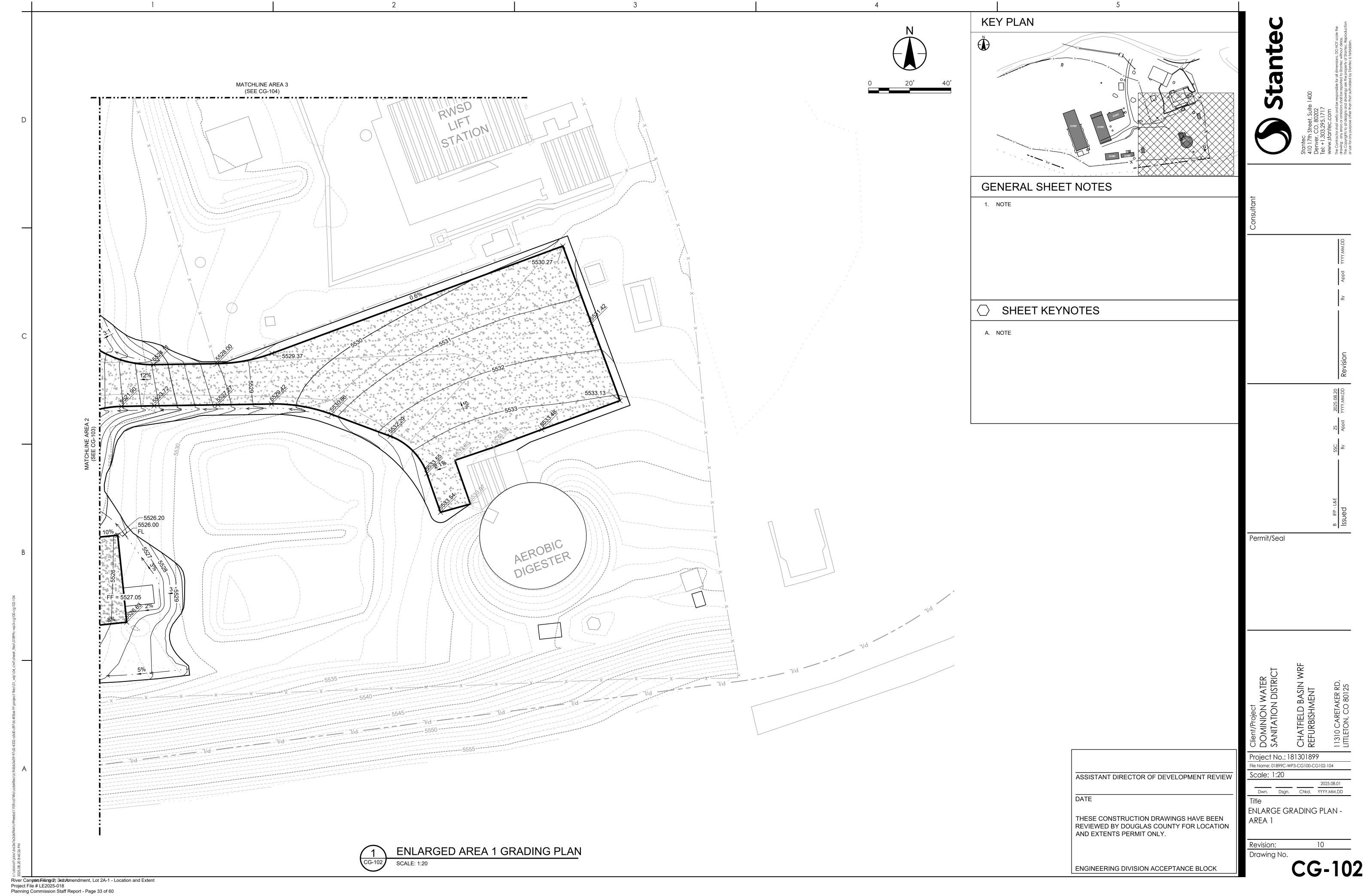


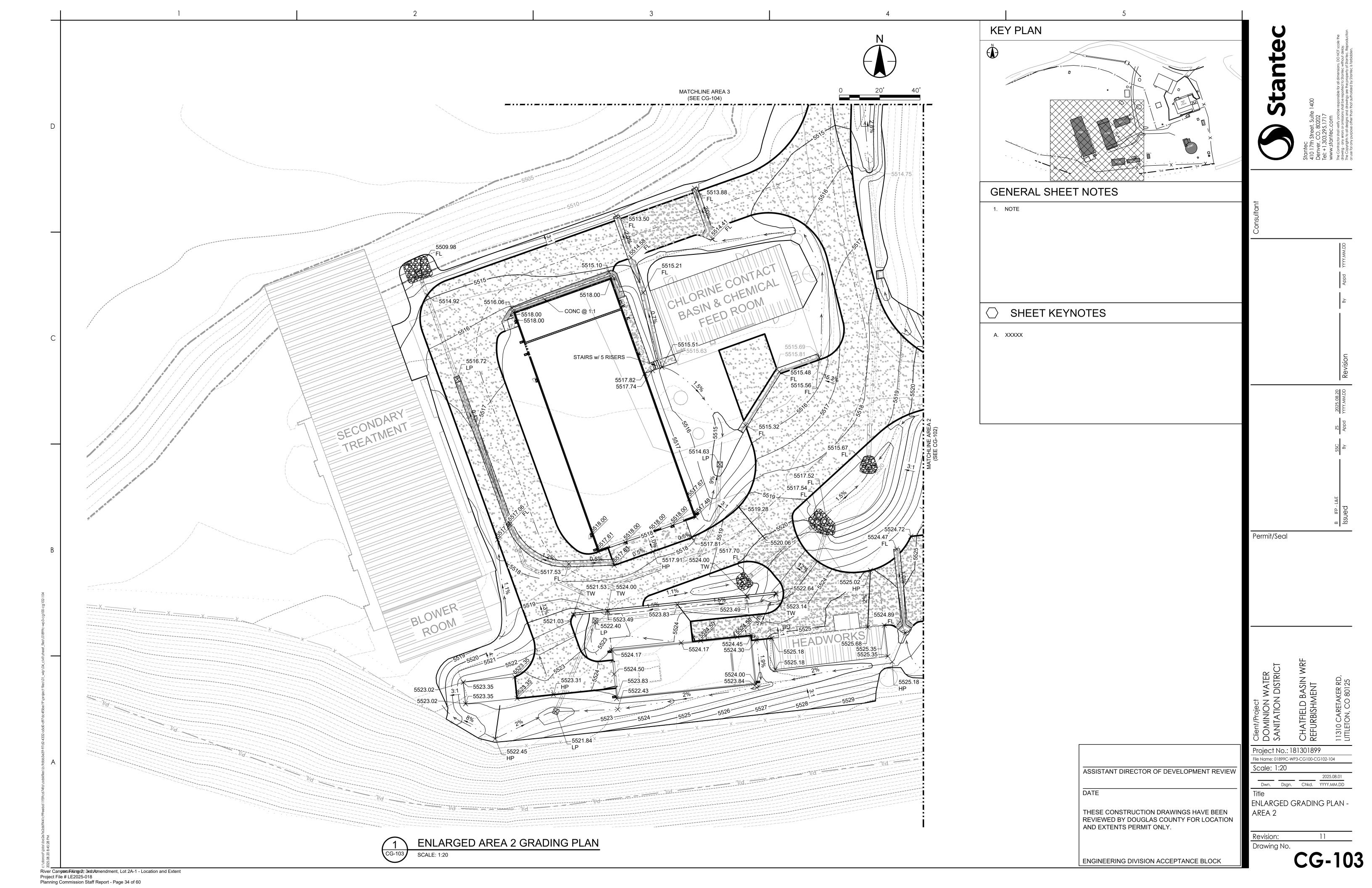


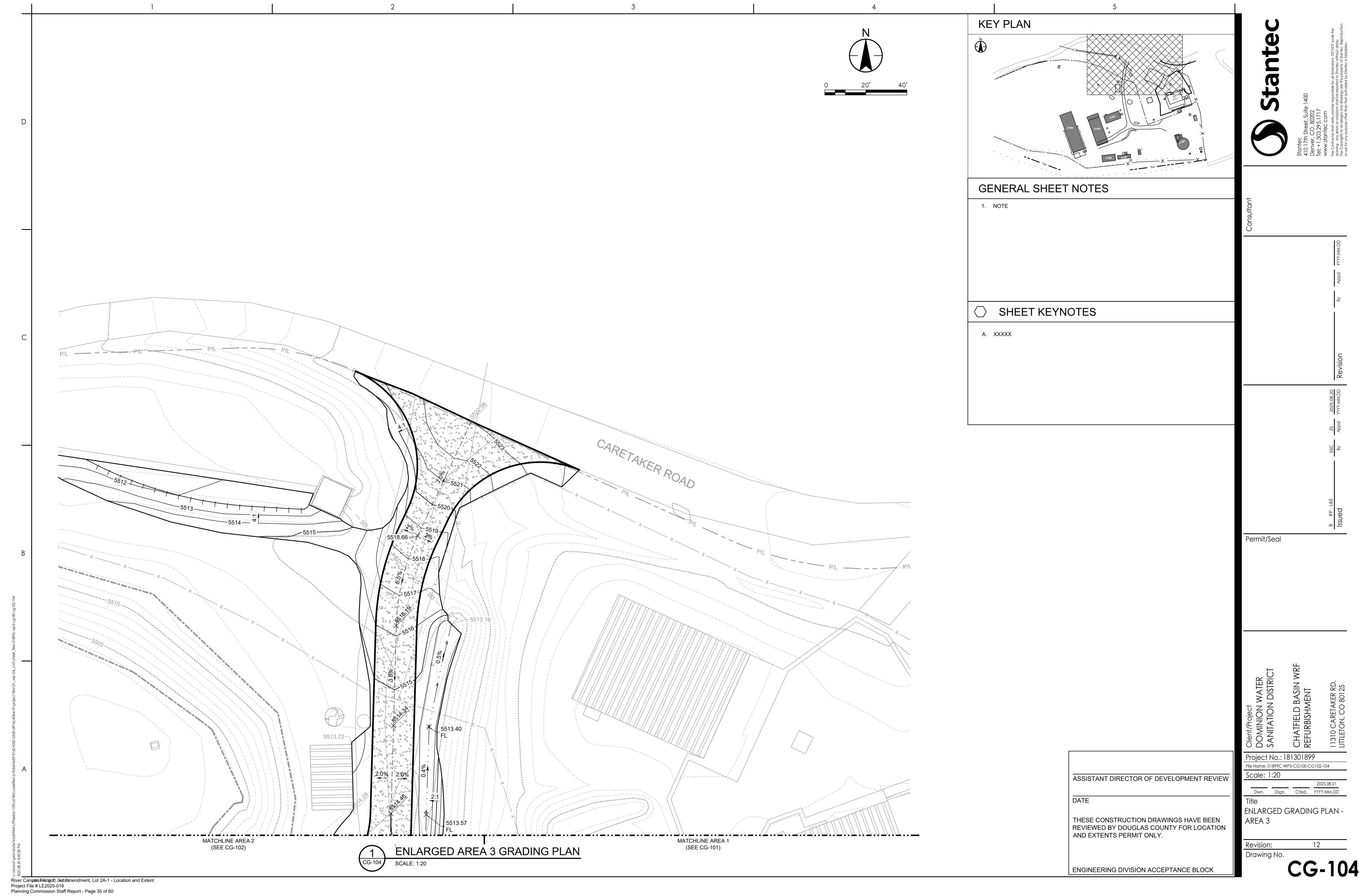


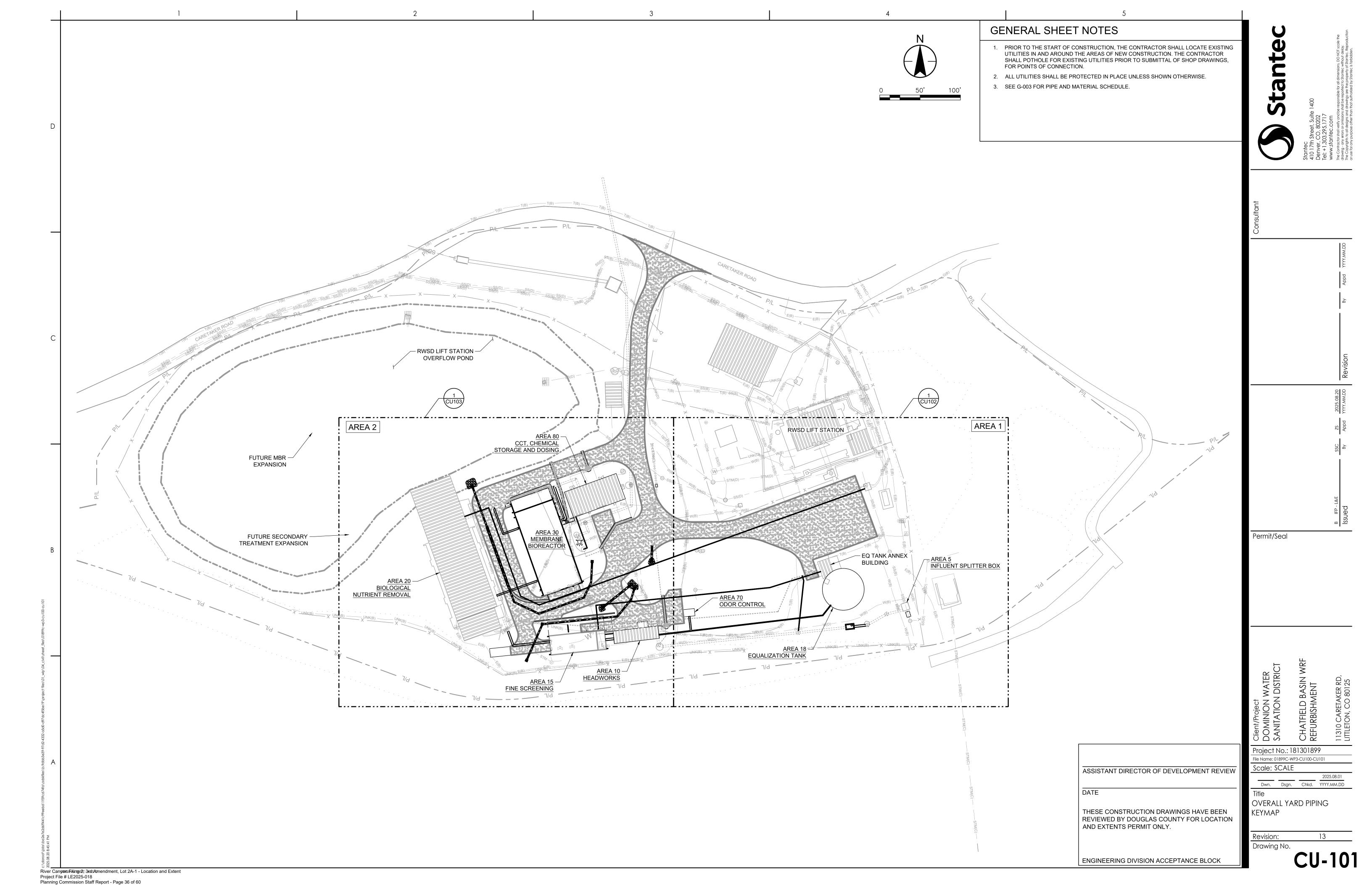


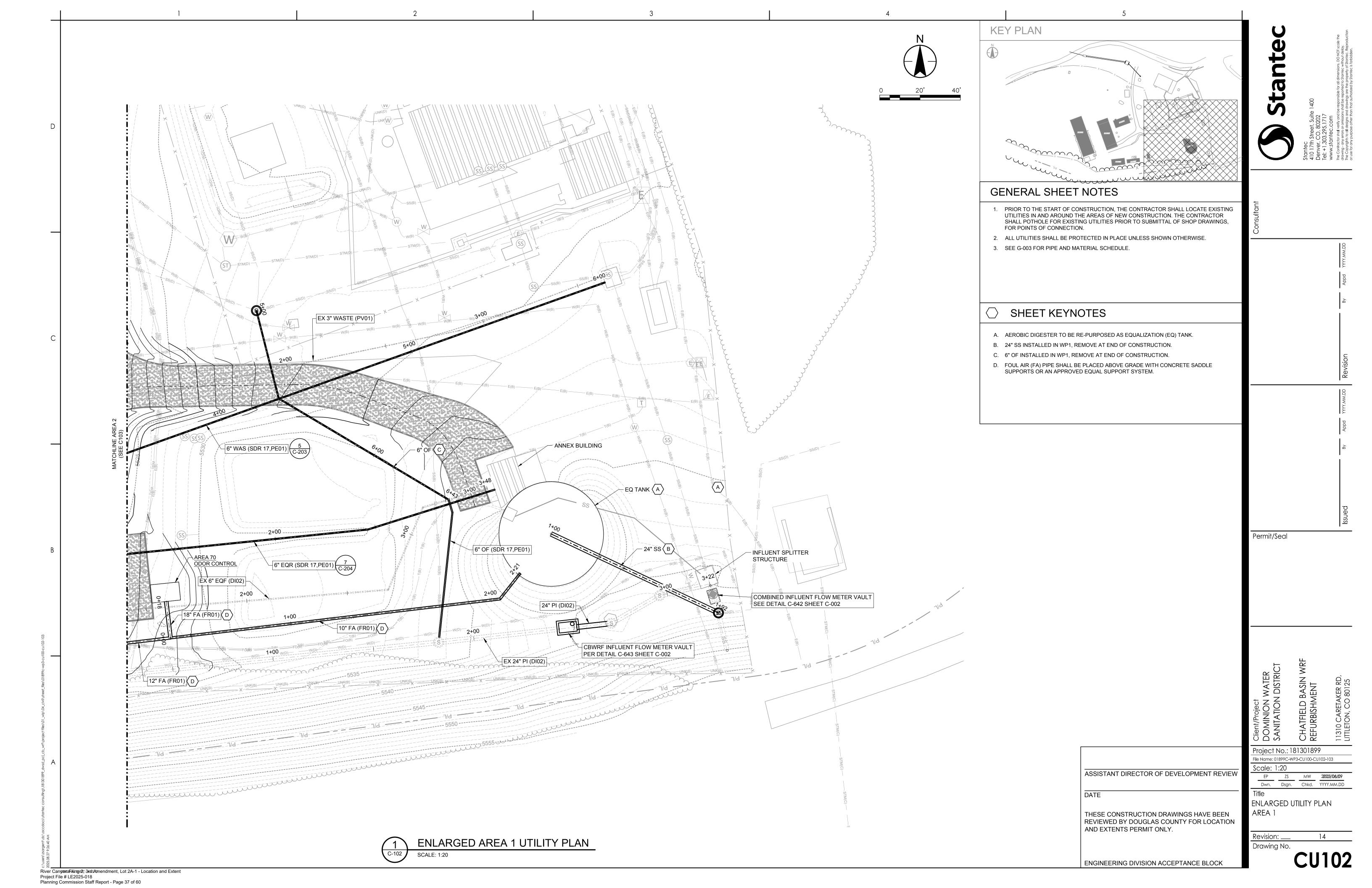


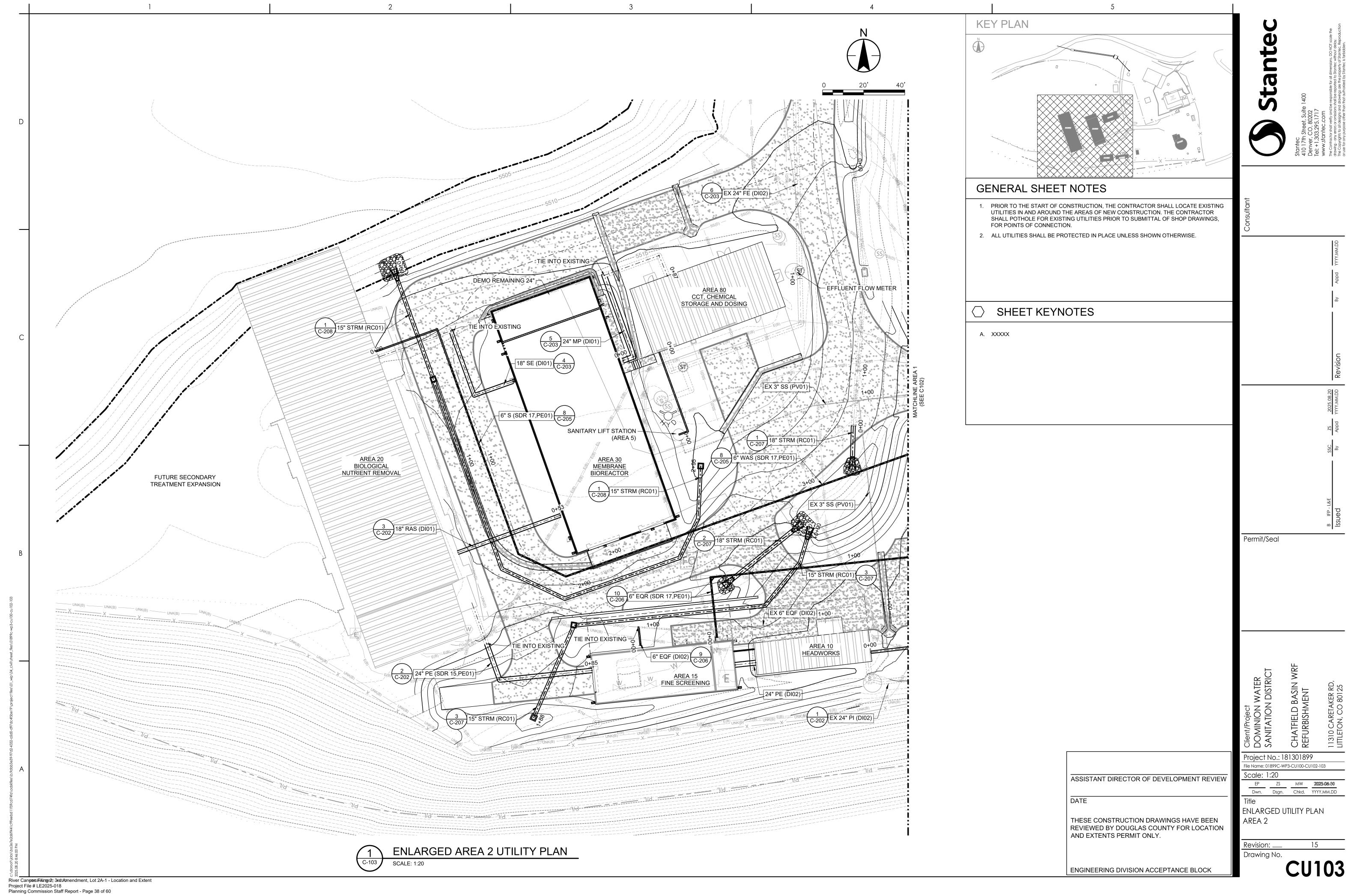


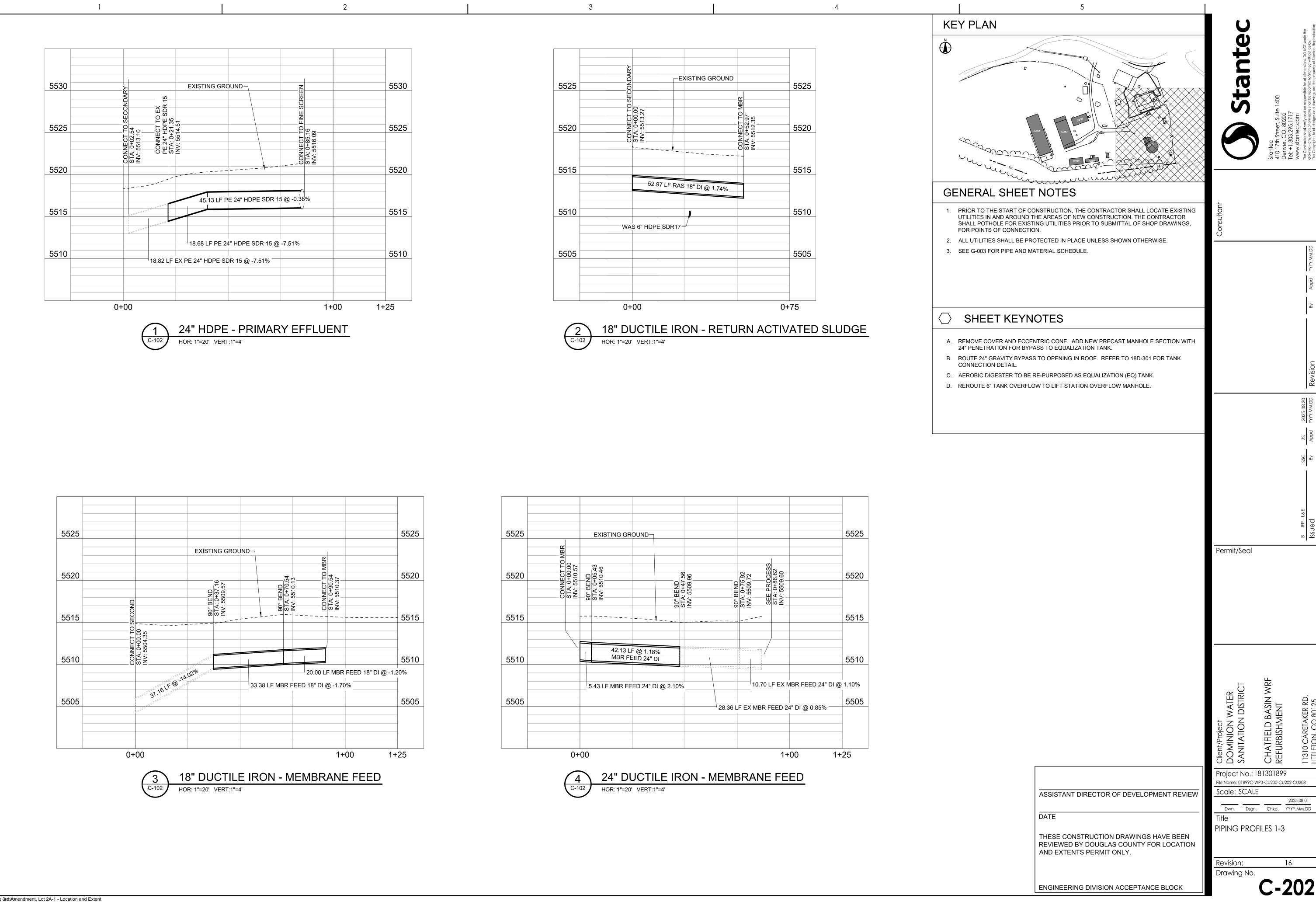




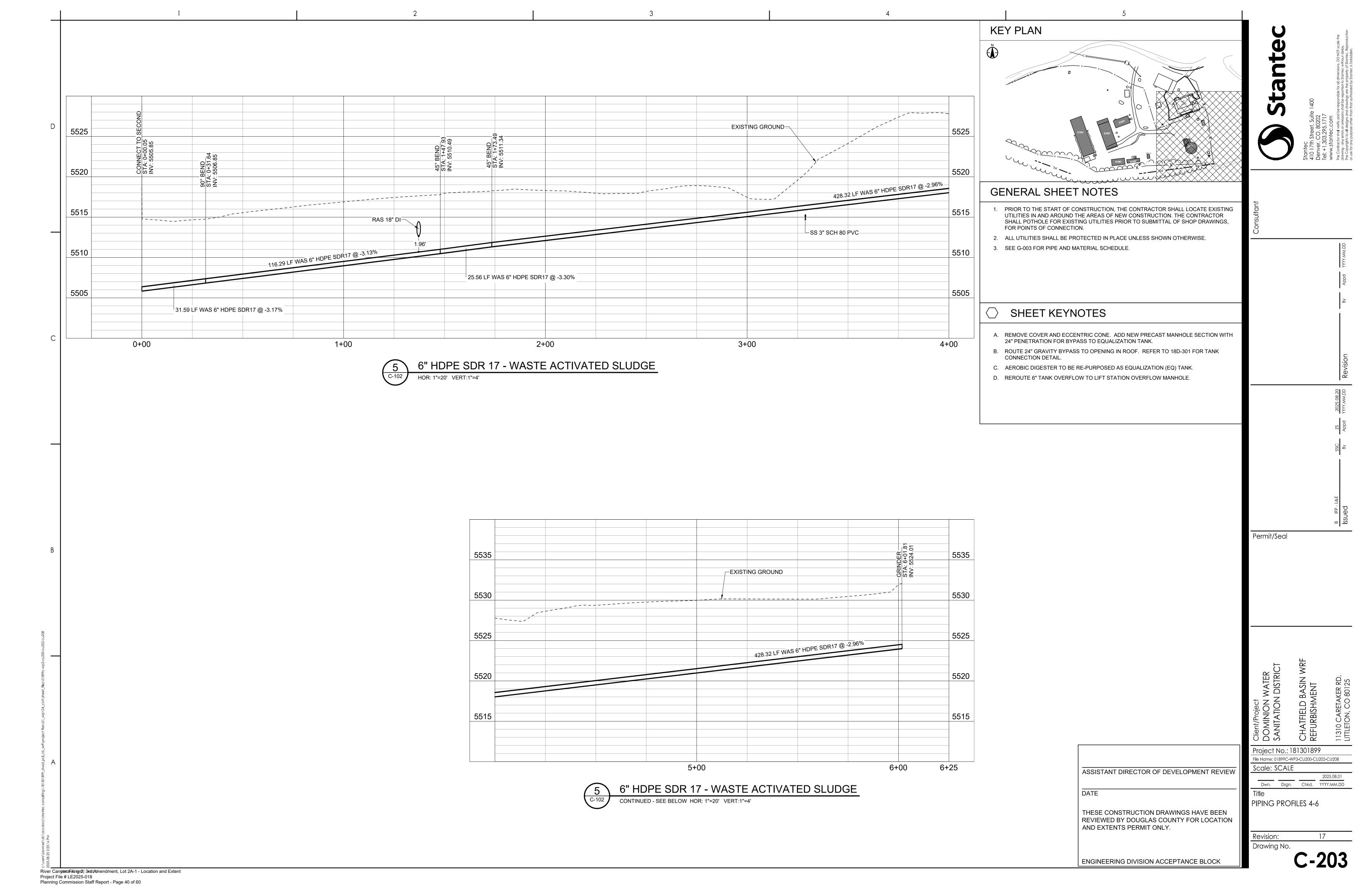








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Planning Commission Staff Report - Page 39 of 60



KEY PLAN ASSISTANT DIRECTOR OF DEVELOPMENT REVIEW THESE CONSTRUCTION DRAWINGS HAVE BEEN REVIEWED BY DOUGLAS COUNTY FOR LOCATION AND EXTENTS PERMIT ONLY. 5535 ENGINEERING DIVISION ACCEPTANCE BLOCK 5530 5530 EXISTING GROUND-GENERAL SHEET NOTES 1. PRIOR TO THE START OF CONSTRUCTION, THE CONTRACTOR SHALL LOCATE EXISTING 5525 UTILITIES IN AND AROUND THE AREAS OF NEW CONSTRUCTION. THE CONTRACTOR SHALL POTHOLE FOR EXISTING UTILITIES PRIOR TO SUBMITTAL OF SHOP DRAWINGS, FOR POINTS OF CONNECTION. 2. ALL UTILITIES SHALL BE PROTECTED IN PLACE UNLESS SHOWN OTHERWISE. 3. SEE G-003 FOR PIPE AND MATERIAL SCHEDULE. -233.99 LF WAS FEED 6" DI @ -1.54% 5520 5520 5515 $^\perp$ WAS RETURN 6" HDPE SDR 17 $^ ^{
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m H}$ 8.95 LF WAS FEED 6" DI @ 0.00% $^{\circ}$ A. REMOVE COVER AND ECCENTRIC CONE. ADD NEW PRECAST MANHOLE SECTION WITH 24" PENETRATION FOR BYPASS TO EQUALIZATION TANK. 0+00 1+00 B. ROUTE 24" GRAVITY BYPASS TO OPENING IN ROOF. REFER TO 18D-301 FOR TANK CONNECTION DETAIL. 6" DUCTILE IRON - WASTE ACTIVATED SLUDGE FEED C. AEROBIC DIGESTER TO BE RE-PURPOSED AS EQUALIZATION (EQ) TANK. D. REROUTE 6" TANK OVERFLOW TO LIFT STATION OVERFLOW MANHOLE. Permit/Seal EXISTING GROUND-5530 EXISTING GROUND-5530 5525 5520 216.64 LF WAS RETURN 6" HDPE SDR 17 @ -3.56% 9.97 LF GRIT 4" HDPE SDR 17 @ 0.00% 5515 . 65.98 LF WAS RETURN 6" HDPE SDR 17 @ -5.38% | 5515 ¹ 29.44 LF WAS RETURN 6" HDPE SDR 17 @ 0.00% Project No.: 181301899 2+00 3+00 3+25 0+00 0+50
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 6" HDPE SDR 17 - WASTE ACTIVATED SLUDGE RETURN PIPING PROFILES River Cangens Riking 123; 3kds Amendment, Lot 2A-1 - Location and Extent Project File # LE2025-018
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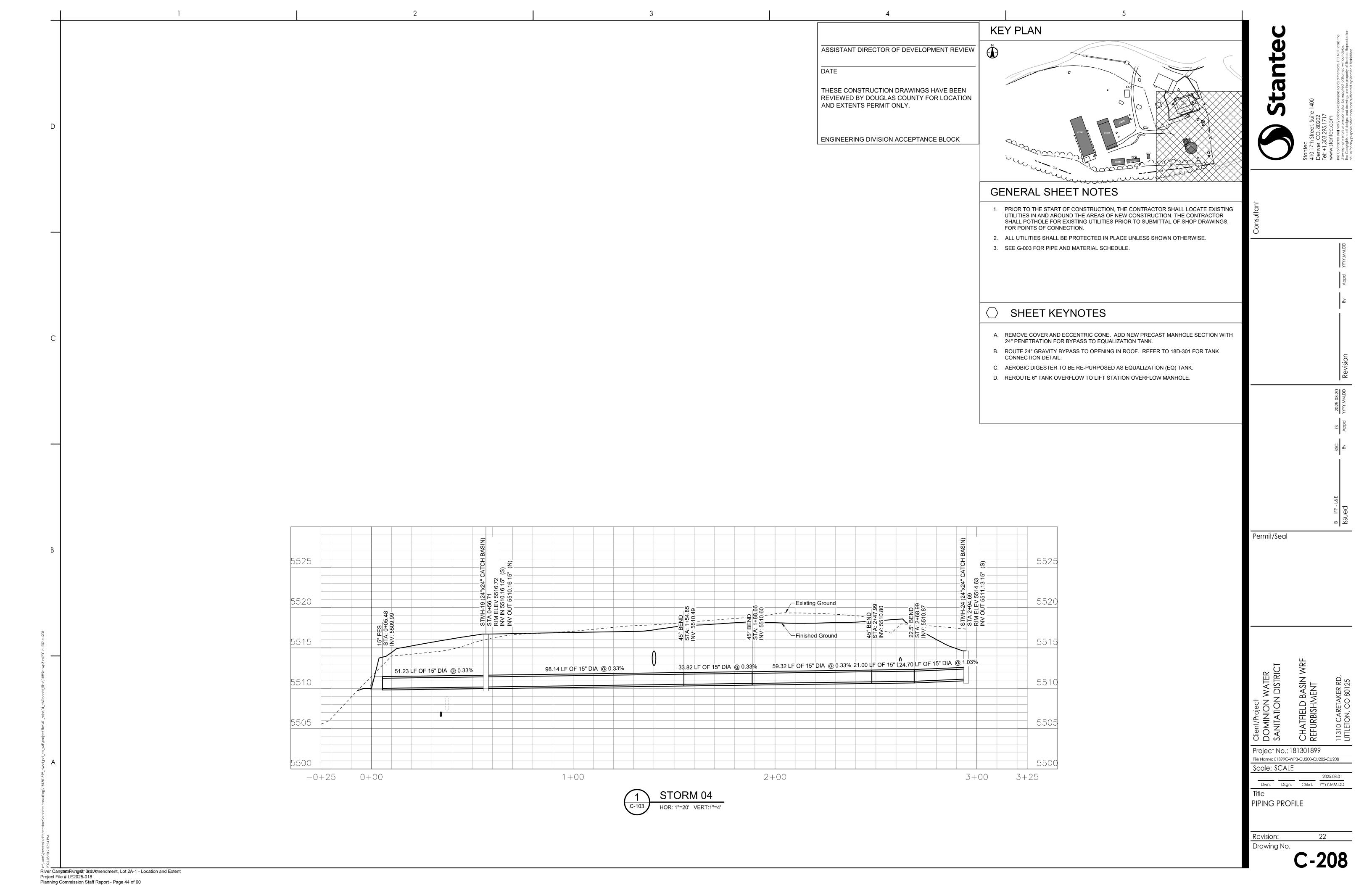
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Project File # LE2025-018
Planning Commission Staff Report - Page 42 of 60

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River Cangon Filling 27 3kd Amendment, Lot 2A-1 - Location and Extent Project File # LE2025-018
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C-207



Location and Extents Report - Douglas County Chatfield Basin WRF Refurbishment

Appendix C

Traffic Narrative



Memo

To: Douglas County From: Stantec Consulting Services, Inc.

File: CBWRF Date: June 13, 2025

Reference: Chatfield Basin WRF Traffic Narrative

1 Background

Planned improvements at the Chatfield Basin site, located at 11310 Caretaker Rd, Littleton, and within Douglas County, warrant the need for a traffic narrative to discuss any potential impacts. At the time of this report the CBWRF is in the process of updating the address. Previously the address for this site was 11290 Caretaker Rd, however the physical location is unchanged. All information included in this narrative was provided by the contractor, unless otherwise noted.

2 Existing Conditions

While this facility is not currently in operation or continuously manned, two lab employees enter the site three days a week for sampling, resulting in two peak hour trips. There are no deliveries occurring during this time. The limited number of vehicles accessing the site has negligible impacts on existing traffic and roadway infrastructure.

3 Construction Conditions

Construction trips will consist exclusively of daily workers and operating equipment. During peak construction (March 2026) there will be 22 workers accessing the site. In addition to these workers, there will be two lab employees accessing the site for sampling. All workers and employees are expected to access the site during the AM peak hour and depart during the PM peak hour. Details regarding frequency and timeline of construction equipment trips are described below.

- 90-ton Boom Crane (Swing Seat): One peak hour trip occurring six times throughout the
 construction period is required for scheduled installations. The crane will arrive onsite during the
 AM peak hour and depart during the PM peak hour. These trips will not occur on the same days as
 those associated with the Concrete Pump Truck.
- 18-Wheeler with Lowboy Trailer (50' long): It is estimated that the peak day will experience four total deliveries. Assuming that half of these will arrive and depart from the site during a single peak hour, this results in four total peak hour trips

Reference: Chatfield Basin WRF

- 10,000-lb RT Forklift: Two forklifts will be brought to the site at the beginning of construction and remain until construction operations are complete. These trips will not contribute to totals during the peak month.
- Concrete Pump Truck: A maximum of 25 concrete trucks will access the site over the course of five hours. Assuming an even arrival rate, five of these will arrive and depart during a single peak hour, resulting in 10 peak hour trips. These trips will last for one or two days and will not occur on the same days as those associated with the 90-ton Boom Crane.

Trip Type	Peak Hour Trips	Peak Construction	Off-Peak Construction	Notes
Workers/Employees	24	X		
90-ton Boom Crane	1	X		No overlap with concrete trucks
18-Wheeler	4	X		
10k-lb RT Forklift	2		X	Beginning of construction
Concrete Pump Truck	10	X		No overlap with boom crane

Based on the information described above, a maximum of 38 peak hour trips will occur during the peak month of construction. Depending on departure rates from the site, the existing northbound-left storage lane along Dante Dr may be insufficient. Additionally, the Waterton Road median storage area is likely too short to accommodate the larger construction equipment and may pose safety and operation concerns when attempting to perform a left-turn maneuver. Because of this, right-turn movements onto and off of Waterton Road are advised when possible.

Future Conditions 4

After construction operations are completed, there will be four employees at the site for seven days a week. These employees are expected to arrive at the site during the AM peak hour and depart from the site during the PM peak hour. In addition to these employees, there will be up to four deliveries occurring every other week. It is assumed that each delivery will arrive and depart within the same hour. It is not expected that all four deliveries will occur during a single peak hour; however, even if they did all occur during a single peak hour, this would result in eight peak hour trips. The maximum number of total peak hour trips occurring during the Future Conditions is twelve. It is not expected that this number of peak hour trips will have significant impacts on future traffic and roadway infrastructure.

Regards,

Stantec Consulting Services Inc.

Brent Hypnarowski, PE Traffic Engineer Phone: (303) 285-4532

brent.hypnarowski@stantec.com

Appendix D

Stormwater Detention and Infiltration Design Data Sheet (Water Quality)

Stormwater Detention and Infiltration Design Data Sheet

SDI-Design Data v2.00, Released January 2020

Stormwater Facility Name: Chatfield Basin Water Reclamation Facility Refurbishment Project

Facility Location & Jurisdiction: 11310 Caretaker Road, Littleton CO. Douglas County

User Input: Watershed Characteristics

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	Extended Detention Basin (EDB)	•	EDB	
	Watershed Area	3.80	acres	
	Watershed Length	700	ft	
	Watershed Length to Centroid	= t	300	ft
	Watershed Slope	e =	0.008	ft/ft
	Watershed Imperviousness	s =	39.00%	percent
Percentage Hydrologic Soil Group A =			73.00%	percent
Percentage Hydrologic Soil Group B =			0.0%	percent
Percentage Hydrologic Soil Groups C/D =			27.00%	percent
	Target WQCV Drain Time	e =	40.0	hours
	Location for 1-hr Rainfall Depths	(us	se dropdown	ı):
	User Input		•	▼

After providing required inputs above including 1-hour rainfall depths, click 'Run CUHP' to generate runoff hydrographs using the embedded Colorado Urban Hydrograph Procedure.

Once CUHP has been run and the Stage-Area-Discharge information has been provided, click 'Process Data' to interpolate the Stage-Area-Volume-Discharge data and generate summary results in the table below. Once this is complete, click 'Print to PDF'.

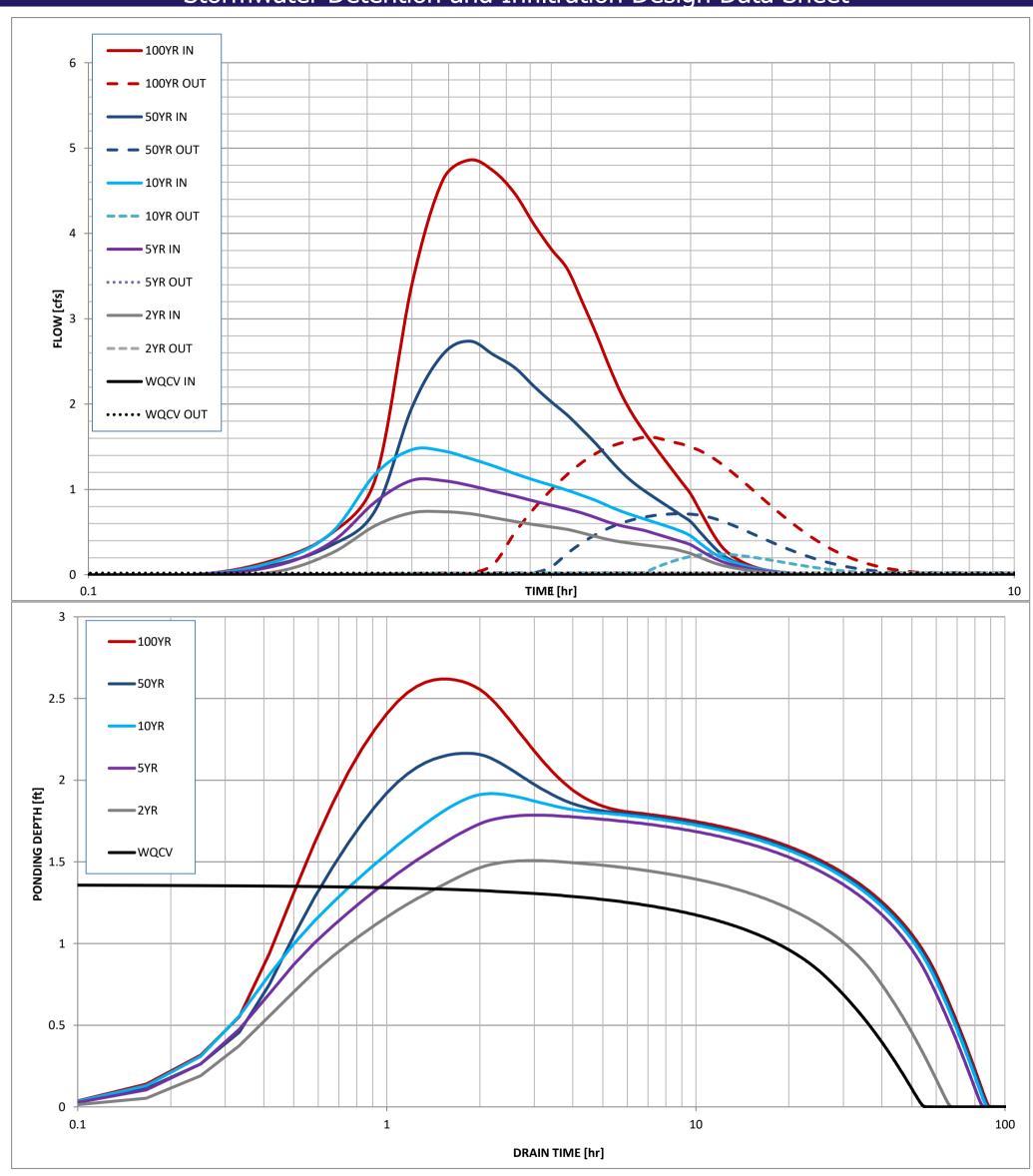
User Defined	User Defined	User Defined	User Defined	
Stage [ft]	Area [ft^2]	Stage [ft]	Discharge [cfs]	
0.00	21	0.00	0.000	
0.80	1,838	0.80	0.015	
1.80	6,138	1.80	0.025	
2.61	9,307	2.61	1.566	
2.80	10,050	2.80	2.531	
3.80	12,900	3.80	4.866	

After completing and printing this worksheet to a pdf, go to: https://maperture.digitaldataservices.com/gvh/?viewer=cswdif Create a new stormwater facility, and attach the PDF of this worksheet to that record.

Routed Hydrograph Results

atea riyarograpii Nesaits							_
Design Storm Return Period =	WQCV	2 Year	5 Year	10 Year	50 Year	100 Year	I
One-Hour Rainfall Depth =	N/A	0.82	1.10	1.35	1.99	2.29	in
CUHP Runoff Volume =	0.056	0.076	0.112	0.146	0.232	0.406	acre-ft
Inflow Hydrograph Volume =	N/A	0.076	0.112	0.146	0.232	0.406	acre-ft
Time to Drain 97% of Inflow Volume =	45.3	55.8	71.7	72.6	69.6	64.7	hours
Time to Drain 99% of Inflow Volume =	49.1	60.3	77.0	78.6	77.2	74.6	hours
Maximum Ponding Depth =	1.36	1.51	1.79	1.92	2.16	2.62	ft
Maximum Ponded Area =	0.10	0.11	0.14	0.15	0.17	0.21	acres
Maximum Volume Stored =	0.056	0.072	0.106	0.125	0.165	0.253	acre-ft

Stormwater Detention and Infiltration Design Data Sheet



From: <u>mailer@digitaldataservices.com</u>

To: <u>Corby, Jordan</u>

Subject: Stormwater Detention and Infiltration Facility - Chatfield Basin WRF

Date: Thursday, June 19, 2025 10:40:42 AM

You don't often get email from mailer@digitaldataservices.com. Learn why this is important

Thank you for submitting to the Colorado Stormwater Detention and Infiltration database. Your facility has been recorded and the local jurisdiction has been notified.

Facility ID: SWDF-20250619094037
Name: Chatfield Basin WRF

Division: South Platte
Jurisdiction: DouglasCo
Design Storm: Full Spectrum

Water Surface Acres: 0.30

Edit Key: e8486d7b304f276c24cd643f6b151553

If you wish to edit the facility in the future, you will need the Edit Key listed above. If you lose the key, you will not be able to edit the facility information in the future.

Caution: This email originated from outside of Stantec. Please take extra precaution.

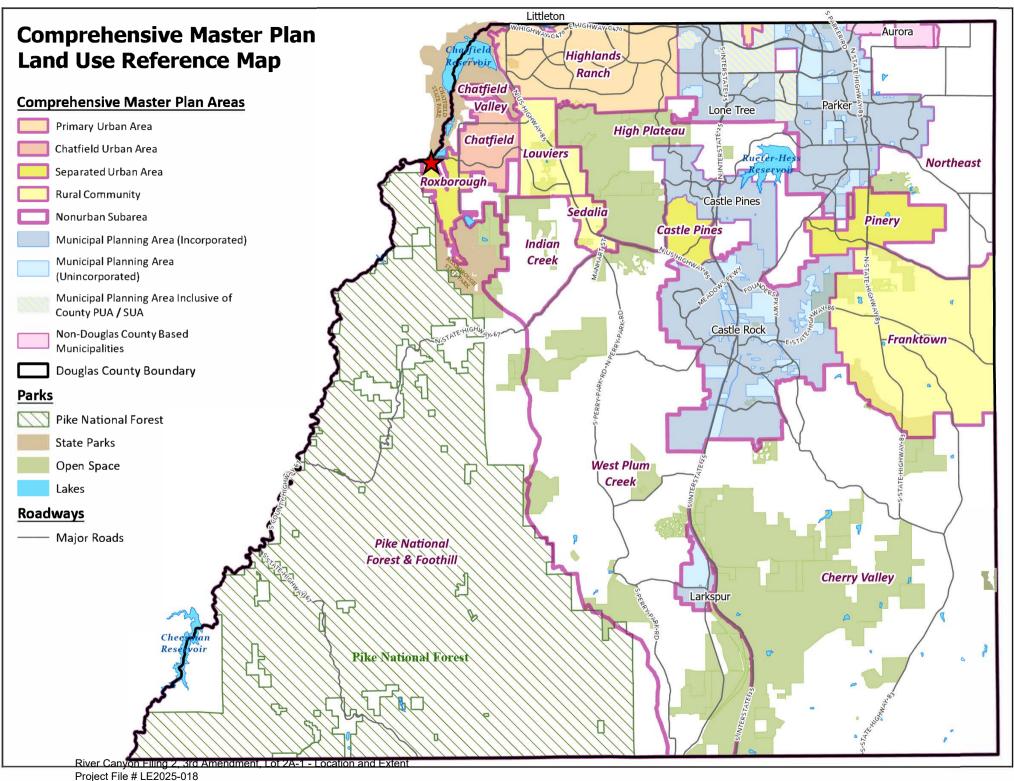
Attention: Ce courriel provient de l'extérieur de Stantec. Veuillez prendre des précautions supplémentaires.

Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.

Stantec is a global leader in sustainable engineering, architecture, and environmental consulting. The diverse perspectives of our partners and interested parties drive us to think beyond what's previously been done on critical issues like climate change, digital transformation, and future-proofing our cities and infrastructure. We innovate at the intersection of community, creativity, and client relationships to advance communities everywhere, so that together we can redefine what's possible.

Stantec Consulting Services Inc.

410 17th Street, Suite 1500 Denver CO 80202-4427



River Canyon Filing 2, 3rd Amendment, Lot 2A-1

LE2025-018 Zoning Map



LEGEND

Roads

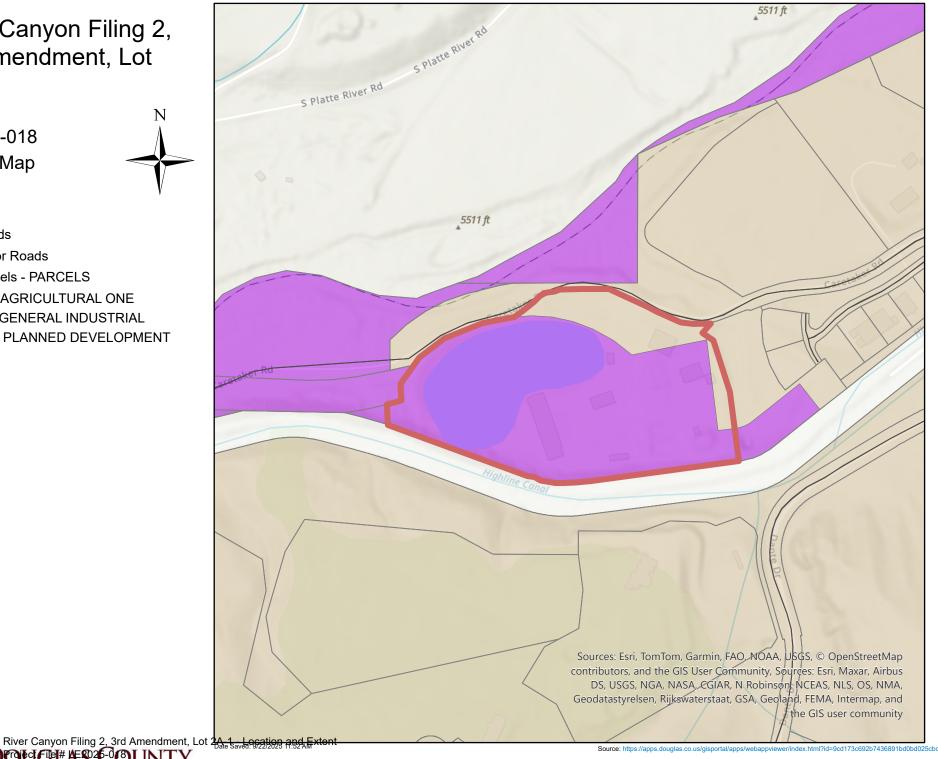
Major Roads

Parcels - PARCELS

A1 - AGRICULTURAL ONE

GI - GENERAL INDUSTRIAL

PD - PLANNED DEVELOPMENT



River Canyon Filing 2, 3rd Amendment, Lot 2A-1

LE2025-018 Aerial Map



LEGEND

— Roads

— Major Roads

Parcels - PARCELS



River Canyon Filing 2, 3rd Amendment, Lot 2016 of the Planning Commission Staff Report, Apage 55 of 60

Referral Agency Response Report

Project Name: River Canyon Filing 2, 3rd Amendment, Lot 2A-1

Project File #: LE2025-018

Date Sent: 09/19/2025 **Date Due:** 10/02/2025

Agency	Date Received	Agency Response	Response Resolution
AT&T Long Distance - ROW		Awaiting referral response	Awaiting referral response
Addressing Analyst	09/19/2025	New addresses have been assigned to the two additional buildings proposed with this project. The entire site was recently re-addressed per request from Dominion Water and Sanitation District. See below and the attached address map for details. Current Addresses 11300 Caretaker Road 11306 Caretaker Road 11310 Caretaker Road 11314 Caretaker Road 11324 Caretaker Road New Addresses 11318 Caretaker Road 11320 Caretaker Road Contact DCAddressing@douglas.co.us or 303.660.7449 with questions.	Information provided to applicant
Assessor		Awaiting referral response	Awaiting referral response
Black Hills Energy		Awaiting referral response	Awaiting referral response
Building Services		Awaiting referral response	Awaiting referral response
Comcast		Awaiting referral response	Awaiting referral response
Engineering Services		Awaiting referral response	Awaiting referral response
CORE Electric Cooperative	09/22/2025	We have received the above-referenced referral request. We have reviewed our records and find that this property is not	No response necessary
Jefferson County Planning and Zoning		in our service territory. Awaiting referral response	Awaiting referral response
Office of Emergency Management	09/19/2025	No comment	No response necessary
Douglas County Health Department		Awaiting referral response	Awaiting referral response
Mile High Flood District		Awaiting referral response	Awaiting referral response
CenturyLink		Awaiting referral response	Awaiting referral response
Sheriff's Office		Awaiting referral response	Awaiting referral response
Sheriff's Office E911		Awaiting referral response	Awaiting referral response
US Army Corp of Engineers		Awaiting referral response	Awaiting referral response
South Metro Fire Rescue		Awaiting referral response	Awaiting referral response
West Metro Fire Protection District		Awaiting referral response	Awaiting referral response
Arrowhead Shores		Awaiting referral response	Awaiting referral response

Referral Agency Response Report

Project Name: River Canyon Filing 2, 3rd Amendment, Lot 2A-1

Project File #: LE2025-018

Date Sent: 09/19/2025 **Date Due:** 10/02/2025

Chatfield Community	09/20/2025	See attached letter.	Comments forwarded to applicant
Association		Summary:	
		Concerns regarding water quality and	
		that it may be premature to approve	
		prior to CDPHE and Denver Water	
		approvals	
Chatfield Farms 1-A		Awaiting referral response	Awaiting referral response
Chatfield Farms 1-B HOA		Awaiting referral response	Awaiting referral response
Ravenna Homeowners Master Association		Awaiting referral response	Awaiting referral response
Roxborough Park Foundation		Awaiting referral response	Awaiting referral response
Roxborough Ridge HOA		Awaiting referral response	Awaiting referral response
Roxborough Village Filing 14B HOA		Awaiting referral response	Awaiting referral response
Roxborough Village		Awaiting referral response	Awaiting referral response
First HOA			
Ravenna Metro District		Awaiting referral response	Awaiting referral response
CDPHE – All Referrals		Awaiting referral response	Awaiting referral response
CDPHE – Water Quality		Awaiting referral response	Awaiting referral response
Control Division			
Roxborough Water & Sanitation District		Awaiting referral response	Awaiting referral response
Denver Water Board		Awaiting referral response	Awaiting referral response
Rural Water Authority		Awaiting referral response	Awaiting referral response
of Douglas County		Awarding referral response	Awaiting referral response
Xcel Energy-Right of		Awaiting referral response	Awaiting referral response
Way & Permits		/waiting referral response	Awarding referral response
High Line Canal		Awaiting referral response	Awaiting referral response
Conservancy			

Trevor Bedford

From: Chatfield Community Association <chatfieldcommunity@gmail.com>

Sent: Saturday, September 20, 2025 12:02 PM

To: Trevor Bedford

Subject: Referral LE2025-018, Dominion Wastewater Treatment Plant

Chatfield Community Association Mission

The mission of CCA is to preserve the character of the Chatfield Basin, and to ensure that development in the area at least meets all state and county regulations, has adequate water, doesn't adversely impact existing residents, and hopefully blends well with the existing semi-rural nature.

We emphasize objective, factual referral and public hearing comments when possible. But some views are inevitably subjective regarding quality of life, rural life, dark skies, and the like

tbedford@douglas.co.us

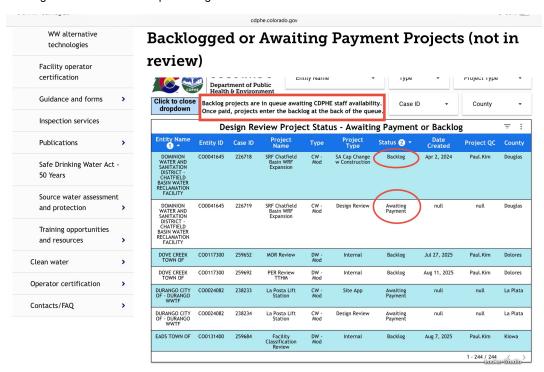
Trevor Bedford Referral LE2025-018

River Canyon Filing 2, 3rd Amendment, Lot 2A-1

Trevor Bedford,

We have the following concerns and questions regarding the Chatfield Basin Water Reclamation Facility proposed refurbishment.

Approval of this application seems premature in as much as Dominion Water and Sanitation District (DWSD) does not appear to have a permit for the wastewater facility. Rules and regulations for the South Platte Basin are being updated, so plans submitted to the county may not meet new regulations when and if a permit is given to DWSD.



We have not seen an agreement with the State or Denver Water for a discharge permit. Plans submitted to the county may not meet requirements by the State or Denver Water for water quality. The location of the discharge facility could change from the submitted plan depending on the agreement with the State and Denver Water.

Is DWSD allowed to begin construction on the wastewater treatment plant prior to approval by the State?

How can the requirements from the county Douglas County Storm Drainage and Design be certain to be adequate when it does not appear that the State has issued requirements for the facility? A 100 year floodplain area boarders part of the DWSD property. Shouldn't DWSD build their wastewater facility to a standard higher than 100 years? In the 2013 flood in Larimer and Boulder counties, several wastewater facilities were affected, causing water contamination for miles downstream. Plans for DWSD's wastewater plant should be built to a higher standard than 100 years in order to protect Chatfield Reservoir drinking water and waters downstream.

We do not see any discussion in this application about plans for reuse of wastewater. If wastewater is discharged into the Platte which has nearby diversions for drinking water and additional discharge water will flow into Chatfield Reservoir, a drinking water supply for a number of districts, we would think any discharge would have to be of a high quality. It is disappointing there is not a more forward thinking facility being designed such as a plan for a closed loop system for reuse. DWSD shows reuse water on only some of their water supply charts, making it unclear if DWSD will actually reuse any of their wastewater discharge. We do not see a permit for a diversion for DWSD to get their wastewater off of the Platte for that reuse.

Until regulations are finalized and permits are issued, this application seems premature and should not be approved.

Team CCA

