



COLORADO
Parks and Wildlife
Department of Natural Resources

Southeast Region
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PH: (719) 227-5200

13 July 2026

Kari Parsons
El Paso County Planning & Community Development
2880 International Circle, Suite 110
Colorado Springs, CO 80910
PH: 719.520.6306
kariparsons@elpasoco.com

**Re: CPW comments on the proposed Xcel Power Pathway Segment 5 Northern Portion
Site Development Plan in El Paso County, File #: PPR2617**

Dear Kari Parsons,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to comment on the proposed Xcel Power Pathway Segment 5 Northern Portion Site Development Plan (the Project) in El Paso County, Colorado. CPW staff members are familiar with the location of the Project and have reviewed documents provided in the application package and in previous agency referrals. CPW provided comments to Xcel in April 2025 for development of the Project within El Paso and Pueblo County (see Attachment A for CPW comments dated April 24, 2025). Since the Project plan in El Paso County does not appear to have changed since April 2025, CPW refers to the attached comment letter for our comments.

We appreciate El Paso County's consideration of our comments and recommendations. As always, CPW staff members are available to work with El Paso County or Project developers



Laura Clellan, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: James 'Jay' Tutchton, Chair · Gabriel Otero, Vice-Chair
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Peter Maguire · Dallas May · Jack Murphy · Rebecca 'Becky' Niemiec · Richard Reading

on how best to minimize development impacts to wildlife and their habitats. If you have questions or would like clarification about any of our comments, please contact District Wildlife Manager Sarah Watson at 719-227-5200 or sarah.watson@state.co.us, District Wildlife Manager Philip Gurule at 719-828-4960 or philip.gurule@state.co.us, or Renewable Energy Liaison Victoria Poulton at 719- 661-7269 or victoria.poulton@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Sauder'.

Travis Sauder

Assistant Area Wildlife Manager - Area 14

P 719.227.5267 | C 719.439.9635

4255 Sinton Rd.

Colorado Springs, CO 80907

travis.sauder@state.co.us

Cc: Tim Kroening - Area Wildlife Manager - tim.kroening@state.co.us

Sarah Watson - District Wildlife Manager - sarah.watson@state.co.us

Philip Gurule - District Wildlife Manager - philip.gurule@state.co.us

Appendix A. CPW Comments on Xcel Power Pathway 1041, El Paso and Pueblo Counties,
Colorado, April 29, 2024



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April 24, 2025

Xcel Energy
Attn: Tiffany Hennig, PE
790 S. Buchanan St., Amarillo, TX 79101
tiffany.a.hennig@xcelenergy.com

Re: Colorado's Xcel Power Pathway 1041, El Paso and Pueblo Counties, Colorado

Dear Ms. Hennig,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the proposed Xcel Power Pathway 1041 Project (Power Pathway Project or Project). CPW understands that the objective of the Power Pathway Project is to improve the Colorado's electric grid and enable future renewable energy development around the state. Overall, the Project proposes installation of approximately 550 miles of new 345-kilovolt (kV) double-circuit transmission line in 12 counties. This comment letter addresses proposed Project development in El Paso County and Pueblo County. These Project activities include installation of 45 miles of 345 kilovolt double-circuit overhead transmission line to support wind and solar energy development. It is our understanding that this is a request for review and comment on Xcel's 1041 permit to construct and operate the proposed transmission line with regard to protected and sensitive species that may potentially be present in the Project area.

The mission of CPW is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has a statutory responsibility to manage all wildlife species in Colorado and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this Project.

The Importance of High Priority Habitats

Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High Priority Habitats (HPH) are defined as sensitive habitats where CPW has recent maps regarding sensitive wildlife use, plus scientifically-backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity



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maps that are collected and updated for a variety of species and their particular habitats; CPW provides these maps to the public and regulatory agencies to assist in project siting and design that avoid and minimize potential adverse impacts to sensitive wildlife species in Colorado.

Aquatic Native Species Conservation Waters HPH

CPW has identified Aquatic Native Species Conservation Waters within the State of Colorado's 2015 State Wildlife Action Plan. These surface water features provide critical habitat for native aquatic wildlife, such as amphibians and fish, while also providing crucial habitat for mammals, birds, and reptiles that utilize the habitat. Within the proposed Project area, there is a possibility of sensitive aquatic native species (fish and amphibian) presence within 14 water features that will be crossed by proposed Project development. These water features include; Coal Creek (39.638489, -104.625765), Box Elder Creek (39.638223, -104.551696), Kiowa Creek (39.418172, -104.469077), Wolf Creek (39.334365, -104.422851), Comanche Creek (39.319348, -104.380089), Bijou Creek (39.292567, -104.314855), East Bijou Creek (39.233009, -104.216371), Big Sandy Creek (39.149642, -104.105839), Mustang Creek (39.034335, -104.090324), Horse Creek (38.967232, -104.090665), Little Horse Creek (38.939228, -104.090984), Steels Fork (38.835022, -104.055082), Pond Creek (38.738305, -104.061825), and one unnamed ephemeral drainage (38.427532, -104.185479).

To avoid or minimize impacts to aquatic species, CPW recommends the following:

- No surface occupancy and no ground disturbance (year-round) within 500 feet of the ordinary high water mark of all of surface waters and the implementation of appropriate stormwater and sediment control BMPs.
- Avoid impact to the stream bed during construction and after reclamation. The stream bed should be handled as a stream crossing whether or not water is present at the time of construction. Minimizing impact to stream beds is a priority for CPW, and avoidance is best whenever possible to protect seasonally wet sections of the creek that provide native amphibians with important breeding and foraging habitats in the spring and summer months.
- Due to the potential of amphibian species being within the Project area and near the creek and around potential springs or wet meadows on properties within the right of way easement, CPW recommends preconstruction surveys in the spring, when amphibian species are most active. CPW would be happy to have further consultations on survey methods and timing.
- Utilize stormwater control best management practices and construction controls for sediment control.
- Avoid any increased sedimentation in nearby drainages, including intermittent creeks to avoid impacts to nearby aquatic habitat.
- Ensure stream crossings are perpendicular to reduce habitat disruption and use structures outside riparian zones where possible.



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- During construction, stream crossing by vehicles should be avoided whether or not water is present at the time of construction. All trucks or heavy equipment should be restricted from crossing streams and if required, we recommend placement of culverts in streams in such a way that they do not impede seasonal surface water flow.
- Finally, CPW recommends that native riparian canopy or stream bank vegetation be conserved where possible.

Mule Deer Severe Winter Range and Mule Deer Winter Concentration HPH

Mule Deer Severe Winter Range is defined as the portion of a species' range where 90% of individuals are found during the harshest two winters out of ten, when snowpack is highest, and temperatures are lowest. Mule Deer Severe Winter Range is defined as the part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten. Within the proposed Project area, Mule Deer Severe Winter Range is collocated along perennial and ephemeral water features identified in the Aquatic Native Species Conservation Waters section above and two Winter Concentration Areas (9S 62W sections 1-16 and 11S 60W) are present along the proposed transmission route. For the identified portions of the proposed Project area that traverse Severe Winter Range and Winter Concentration Areas, CPW recommends the following timing limitation be implemented for construction, operation, and decommissioning phases:

- No permitted or authorized human activities from December 1st to April 30th. If this cannot be achieved, CPW recommends starting construction outside of the winter timing to reduce impacts to mule deer during this crucial time of year.

Burrowing Owls

Burrowing Owls (*Athene cunicularia*) are listed as State Threatened and are known to nest in active or inactive prairie dog (black-tailed or white-tailed) burrows or the burrows of other terrestrial wildlife. Because burrowing owls are included in the protections afforded by the Migratory Bird Treaty Act (MBTA), it is important to avoid actions that could negatively impact the owls, nests, and eggs. To best avoid or minimize impacts to Burrowing Owls within the Project area, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends conducting surveys consistent with CPW's [Burrowing Owl Survey Protocol](#).
- CPW recommends that targeted surveys should be conducted for any activities resulting in ground disturbance between March 15th and October 31st.
- If nesting Burrowing Owls are present, no human encroachment or surface disturbance should occur within a 200-meter buffer of nesting burrows from March 15th to August 31st.



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- If Burrowing Owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until late fall after they have migrated.
- If seismic work could disturb or collapse dens containing nests, that work should avoid the nesting period.

Swift Fox Potential Denning Habitat

Swift fox (*Vulpes velox*) is listed in Colorado as a species of State Special Concern, and the eastern plains of Colorado, including the proposed Project area, contain potential swift fox denning habitat. To minimize the impact of future development on occupied, high-quality swift fox habitat, CPW recommends the following:

- Conduct pre-construction surveys for active den sites in coordination with CPW and/or during burrowing owl survey execution.
- Avoid human encroachment, surface disturbance, or construction activity within 0.25 miles of an active maternal den site from March 15th through June 15th.

Mountain Plover Nest Sites

Mountain Plovers (*Charadrius montanus*) are listed in Colorado as a species of State Special Concern. Mountain Plovers can nest in short-grass prairie, dryland cultivated farms, and prairie dog towns; all of which are located within the proposed Project boundary. To avoid or minimize impacts, CPW recommends the following:

- Complete Mountain Plover Nest Surveys using U.S. Fish and Wildlife Service (USFWS) protocols in potential nesting habitats and that any active Mountain Plover nests within the proposed Project area be protected through the application of appropriate spatial buffers, and planning construction activity within nesting habitats outside of critical nesting periods for the species (April 1st through August 15th).
- Where active nests are identified immediately ahead of construction, CPW recommends that they should be flagged and avoided through the application of a seasonal restriction of no human disturbance within 300 feet until the young are hatched and independent of the nest as determined by CPW or a qualified biologist.

Raptors and Migratory Birds

The proposed Project area contains suitable habitat for nesting raptors and migratory birds. All migratory birds are protected from potential take under the Migratory Bird Treaty Act, and any removal or disturbance of an active migratory bird nest requires prior consultation with CPW and USFWS. To ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, CPW recommends the following:

- Consult with USFWS prior to construction of the proposed Project. Both active and potential nest sites, as well as winter night roosts, should be considered when evaluating potential disturbance during construction.



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- Install transmission lines be consistent with Avian Power Line Interaction Committee (APLIC) standards and that bird diverters be installed within 1/4-mile of any lake, drainage, or riparian area and within the raptor nesting buffer for all active nests.

General Comments

CPW prefers that new transmission lines follow existing transmission corridors and pre-disturbed areas, such as roads, whenever feasible, to minimize additional impacts on wildlife and habitat fragmentation. We encourage project proponents to consider shifting portions of the preferred route that are not co-located with existing linear surface disturbances to areas that already contain them. Paralleling existing rights-of-way and using existing access routes to the greatest extent possible helps mitigate impacts on wildlife, natural resources, and land uses.

CPW appreciates the opportunity to comment on the proposed Pueblo County and El Paso County portions of Xcel's Power Pathways transmission line in southeastern Colorado. CPW requests that Xcel and Counties continue to involve our staff as the development of this Project continues. CPW would like the opportunity to review the results from all biological surveys conducted by Xcel so we can provide more specific site-based recommendations. CPW appreciates the collaboration with Xcel as we jointly strive for responsible land use development that effectively protects sensitive wildlife species and their habitats

When the plan updates are available or if you have any questions, please contact Southeast Region Land Use Specialist, Carolyn Craveiro de Sá at 719-747-3838 or via email at carolyn.craveirodesa@state.co.us.

Sincerely,

Tim Kroening
Area Wildlife Manager - Area 14
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Colorado Springs, CO 80907
tim.kroening@state.co.us

cc: Aaron Berscheid, CPW District 283 Wildlife Manager, aaron.berscheid@state.co.us
Sarah Watson, CPW District 282 Wildlife Manager, sarah.watson@state.co.us
Philip Gurule, CPW District 288 Wildlife Manager, philip.gurule@state.co.us
Mike Brown, CPW Area 11 Wildlife Manager, mike.brown@state.co.us
Justin Morris, CPW District 228 Wildlife Manager, justin.morris@state.co.us

