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2880 International Circle
Colorado Springs, CO. 80910

Submitted electronically via EDARP: www.epcdevplanreview.com

August 26, 2022 (Submittal #3)

RE: Letter of Intent- Site Development Plan Application for Pike Solar LLC

Dear Ms. Parsons and El Paso County Planning and Development Department (PCD),

This Letter of Intent (LOI) is being submitted as part of the Site Development Plan (PPR) Application for Pike Solar Photovoltaic ("Project"). The Applicant and Project Owner is Pike Solar LLC ("Applicant"), a wholly owned subsidiary of juwi, Inc. (juwi).

Introduction to Project and Request

The Applicant is pleased to present this Site Development Plan application to construct, operate and decommission the Pike Solar Photovoltaic Project, a solar facility capable of generating up to 175 alternative current (AC) megawatts (MW) of photovoltaic (PV) solar energy. The proposed Project consists of ground-mounted solar arrays and associated infrastructure. The Project is sited on Colorado Springs Utilities (CSU)-owned parcels (56000-00-123 and 56000-00-140) totaling 4,998.37 acres. Within that, the Project is designed on 1,350 acres (WSEO siting envelope), comprising the project components including the solar array and substation, pursuant to a lease agreement with CSU.

The Pike Solar Project was selected under CSU's RFP-GM-141545 Renewable Energy Solicitation (RFP) for new renewable energy generation resources to serve CSU's customers. The Project will support Colorado Springs Utilities Sustainable Energy Plan which will help reach the energy vision of an 80% carbon reduction and retire all coal generation by 2030. According to CSU, on August 27th, 2021, the Martin Drake Power Plant burned the last of its final delivery of coal. The plant will continue to operate on natural gas until the end 2022 when it will be demolished, which will align timely with the COD date for the Project. Additionally, this also aligns with and supports the Colorado Renewable Energy Standards (RES; C.R.S § 40-2-124) and the latest literature published from Governor Polis titled "Greenhouse Gas Pollution Reduction Roadmap" that was issued in January 2021.

CSU, as the identified purchaser of the Project's power, entered into a Power Purchase Agreement (PPA) with Pike Solar LLC on September 14, 2020 **(Appendix E- Power Purchase Agreement)**. This agreement outlines the terms and conditions in which CSU agrees to purchase the electricity generated from this Project for a minimum of seventeen years and options to extend thereafter. Both Parties have entered into a Large Generator Interconnection Agreement (**Appendix AO – Executed Interconnection Agreement)**.

Current zoning for the undeveloped properties includes Residential Rural-5 (RR-5), Agricultural- 5 (A-5) and Agricultural-35 (A-35) **(Appendix P- Zoning Map)**. The surrounding land is primarily used for livestock

grazing with dispersed residential development. The WSE-O zone for the Pike Solar Project, as approved by the BoCC on March 1st, 2022, consists of all parcels containing the solar array, collection line, substation, and laydown yards.

The proposed Project's WSE-O Dimensional and Density Standards are provided in Table 1 below as required by Section 4.3.5 of the El Paso County Land Development Code (LDC).

Table 1: Pike Solar WSE-O Amended Dimensional and Density Standards

Overlay District	**Underlying Zoning District**	**Minimum Setbacks for structures (ft.)**	**Maximum Height of Solar Panels (ft.)**	**Maximum Height of Transmission Line Poles (ft.)**	**Maximum Height of MET Stations (ft.)**	**Maximum Height of Inverter-Transformer Pairs (ft.)**	**Maximum Height of Substation Facilities (ft.)**
Pike Solar WSE-O	A-5	25	15	100	20	20	75
	A-35	25	15	100	20	20	75
	RR-5	25	15	100	20	20	75

Pike Solar LLC and CSU are requesting approval of the Site Development Plan Application for the Pike Solar Project to allow construction, operation, maintenance, and decommissioning of a utility-scale solar energy facility; specifically, the Pike Solar Project. The solar PV system will be composed of photovoltaic modules that convert the sun's radiant energy into electricity. The modules will be mounted on horizontal single-axis tracking racks that rotate from east to west to track the sun over the course of each day. The modules will be electrically connected in series strings to achieve a system DC design voltage of 1500V DC. Cables from the module strings will be buried in trenches and combined with DC combiner boxes located strategically throughout the field. The DC combiners will connect multiple arrays in parallel, from which point the electricity will be conducted via cables to the inverters, which convert the DC power generated by the modules to grid-synchronized AC power. Step-up transformer(s) will raise the inverter AC output voltage to 34.5kV, and the Solar Project output will pass through an AC collection system to the Pike Solar substation and ultimately to the Point of Interconnection (POI) at the Williams Creek Substation via a proposed 1,400-foot 230kV overhead transmission line.

CSU will also be requesting upgrades to their substation in order to accommodate for the power generated from this project. Williams Creek is an existing 230kV ring bus substation that will be expanded into a breaker and a half in bays 2, 3, and 4 with the installation of six circuit breakers. These upgrades will accommodate a loop in of the existing 230kV NX-CL transmission line and a renewable customer tap. The substation plot does not require expansion and updates to drainage, grading, ground grid, cable trench, fencing, yard rock, conduit, cabling, steel, bus, instrumentation, protection and control, and substation equipment will only be installed or modified as required for the installation of the new equipment. No work for other future expansion will be considered. The City of Fountain has reserved a corridor on the western perimeter of the WSEO boundary for a 115Kv transmission line to connect to the Williams Creek Substation as depicted on the 1041 Map and Site Dev Plan associated with this Project.

This LOI seeks to address all relevant items as they pertain to El Paso County LDC Chapter 6 and the Engineering Criteria Manual (ECM) for the proposed Project. A WSE-O Plan has been prepared and submitted separately (PCD File No. WSEO211) in accordance with the El Paso County Planning & Community Development Department (PCD) requirements **(Appendix D- WSE-O Overlay Plan)**.

WSEO and 1041 File Appendices referenced herein:

A – WSE-O Application Form

B – Certification of Notice to Mineral Estate Owners

C- Vicinity Map

D – Intentionally Blank

E- Power Purchase Agreement

F- Biological Resources Report

G- Phase I Environmental Site Assessment

H- Non-Wetland Water Features and Wetlands Report

I- USFWS Correspondence

J- CPW Correspondence

K- USACE Correspondence

L- FAA Correspondence

M- OAHP Correspondence

N- Hanover Correspondence

O- PPRBD Correspondence

P- Zoning Maps

Q- Air Quality Management Plan

R- Grading and Erosion Control (GEC) Plan

S- Drainage Report

T- Geotechnical Engineering Report

U- Elevation Plans

V- Fire Prevention and Protection Plan

W- Emergency Response Plan

X- Integrated Noxious Weed Management Plan

Y- Decommissioning Plan

Z- Water Service Letter

AA- Class I Cultural Resources Report

AB- Electromagnetic Interference Report

AC- Visual Simulation

AD- Lighting Plan

AE- Community Meeting Advertisements

AF- Correspondence Re: Regional Trail Alignment

AG- Colorado Springs Utilities Service Territories Map

AH- Operations and Maintenance Plan

AI- Haul Route Map

AJ – Traffic Memo

AK– Road Conditions Survey Work Plan

AL– Utility Request for Proposal

AM– Proposed Fountain Easement Route & Correspondence

AN– Geologic Hazards Study

Additional Documents:

WSEO Plan Map

Interconnection Agreement

Proof of Liability Insurance

Tri State Crossing Agreement

Xcel Crossing Agreement

Draft Kinder Morgan Crossing Agreement

Correspondence with Kinder Morgan Regarding Agreement and Execution Timing

GEC Report – Stormwater Management Plan (90% final)

Project Owner/Applicant and Consultant Information

	Name	Address	City	State	Zip	Telephone
Project Owner/Applicant	Pike Solar, LLC	1710 29th Street, Suite 1068	Boulder	CO	80301	303.440.7430
	Colorado Springs Utilities	2855 Mesa Road	Colorado Springs	CO	80904	719.668.3862
Point of Contact	Brian Vickers, Project Manager	1710 29th Street, Suite 1068	Boulder	CO	80301	720.838.2302
Consultants	Pinyon Environmental, Inc.	3222 South Vance Street, Suite 200	Lakewood	CO	80227	303.980.5200
	Core Consultants, Inc. Rob Hansen, PE	3473 S. Broadway	Englewood	CO	80113	303.703.4444
	Terracon Tyler Compton	4172 Center Park Drive	Colorado Springs	CO	80916	719.597.2116
	Stantec Fadi Jadoun	3133 West Frye Road Suite 300	Chandler	AZ	85226	480.687.6128
	EMDEX, LLC Chris Hooper	1356 Beaver Creek Drive	Patterson	CA	95363	408.866.7266

Site Location, Size, and Zoning

Site Location

The Project is located southeast of the City of Fountain in El Paso County, Colorado, three miles southeast of the intersection of Link Road and Squirrel Creek Road. The property falls within Township 16S, R64W, Sections 7,18, 19, 30, 31 and Township 16S, R65W, Sections 11, 12, 13, 14, 23, 24, 25, 26, 36 in El Paso County, Colorado. The Fountain Landfill is adjacent to the northwest boundary of this Project. The Palmer Solar LLC photovoltaic facility is located west of the Project. Other surrounding lands are predominantly grazing lands with dispersed residential areas.

Size

The WSE-O boundary (as proposed under PCD File No. WSEO211) totals to 4,998.37 acres, wherein the siting envelope totals to 1,350 acres and will include the solar array, collection line corridor, substation, and laydown yards. The solar array will consist of a single-axis tracking solar PV panels, DC to AC inverters, switches and underground collection lines. The underground plowed medium voltage AC feeders, or collection lines, will transport energy from the inverters to converge at the transformer in the substation located on parcel 56000-00-123. The above-ground high-voltage AC feeders, spanning approximately one mile, will transport the energy to the Williams Creek Substation.

Zoning

The proposed WSE-O would consist of the below parcels and ownership **(Appendix P)**:

Parcel ID	Current Zoning	Landowner
56000-00-123	A-35	Colorado Springs Utilities
	RR-5	Colorado Springs Utilities
56000-00-140	A-5	Colorado Springs Utilities
	A-35	Colorado Springs Utilities
	RR-5	Colorado Springs Utilities

Request

The Applicant requests approval of a Site Development Plan application for the Pike Solar Project, a solar facility capable of generating up to 175 alternative current (AC) megawatts (MW) of photovoltaic (PV) solar energy. The proposed Project consists of ground-mounted solar arrays and associated infrastructure. The Applicant has worked to develop a plan that complies with local regulatory requirements as well as state and federal requirements. The Project will provide a clean alternative for electricity needs of the community. Structures will consist of two guard shacks (one on the North end of Project boundary, the other on the Southwest end of the Project), one O&M building, and one Control Building. These are reflected on the site plan, as well as the elevation plans.

The need for this Project is based upon CSU's plans, state and federal renewable initiatives and local renewable goals. CSU developed a Sustainable Energy Plan through their Energy Vision. Within this plan, CSU will achieve an 80% carbon reduction and retire all coal generation by 2030, including the Martin Drake Power Plant. The State of Colorado has also published additional literature encouraging increased renewable facilities and enlisting a need for growth to utilities such as CSU. On January 14, 2021, Governor Polis released the "Greenhouse Gas Pollution Reduction Roadmap." In 2019, Gov. Polis partnered with the Colorado General Assembly to pass 14 pieces of climate legislation, including the Climate Action Plan to Reduce Pollution (House Bill-1261), which established science-based targets of reducing statewide greenhouse gas (GHG) pollution 26% by 2025, 50% by 2030, and 90% by 2050 from 2005 levels. Governor Polis directed state agencies to develop a roadmap to achieving these goals with a whole-of-state effort, focusing particularly on the nearer term 2025 and 2030 targets.

Request Justification

- **Alternative Lighting Plan Request Pursuant to LDC Section 6.2.3(E);**
  The Applicant requests approval of an alternative lighting proposal in lieu of a full photometric plan for the entire Project, as is required per LDC Chapter 6. Specifically, the Applicant requests an alternative Lighting Plan Set which includes a photometric plan for only the northern and southern boundaries of the Project, while for the remainder of the Project area, the Lighting Plan submitted displays the location and extent of all lighting levels, demonstrating compliance with the intent and limitations in the LDC's Lighting Standards on lighting intensity and type.

  Relief from providing a full photometric plan is requested due to the extremely limited nature of the Project's lighting, such that lighting will never reach the maximum levels at the property boundaries, and most of the Project lighting is to be used only for infrequent evening maintenance for this Project. Most of the Project lighting can be considered necessary only for infrequent maintenance or troubleshooting (i.e.: substation yard or power station work). The Applicant is only using the substation lights when night work is essential, which will be infrequent.

- **Alternative Landscape Design Request Pursuant to LDC Section 6.2.2(A)(4)**
  Please refer to the Landscape Plan included in the Site development Plan application packet, which has been prepared pursuant to the comment made by the reviewing Planning Department staff. The Landscape Plan depicts the revegetation areas and seed mix. Routine landscaping will be limited to vegetation management: reseeding, mowing, and control of noxious weeds. Given the rural and agrarian nature of the adjacent properties, seedbanks in the area will assist in passive revegetation. The Integrated Noxious Weed Management Plan **(see Appendix X)** will be used to help prevent non-native vegetation from growing on the Project site.

- **Proposed Parking Pursuant to LDC Section 6.2.5(D)(1)(a)(ii): Parking for Uses Not Listed**
  Applicant requests approval for the provision of a total of one (1) parking space, which is ADA-compliant (and marked as such) in accordance with the requirements contained within the LDC. As the Project's use is not listed in Table 6-2 of the LDC, the parking as proposed herein and as shown on the site development plan has been developed through discussions with PCD Staff. The parking as proposed is due to the minimal need for parking, as the Project is an unmanned facility, with no permanent or daily employees onsite, and traffic to the site being extremely limited to maintenance and repairs as needed. As such, the request meets the purposes of the Parking requirements within the LDC. Specifically, the request does not detract from continuity, connectivity and convenient proximity for pedestrians between or among existing or future uses in the vicinity, as the site will not be attracting visitors or customers and traffic will be limited to maintenance and repairs as needed. Limiting the Project's parking area as proposed will also minimize unnecessary visual and aesthetic impact along the public road, and on the surrounding neighborhood, as it will leave a greater portion of the site 'undeveloped'. Finally, the request creates no detrimental impact on natural areas or features. Finally, the request to provide minimal parking as part of the Project development will work to minimize impacts to the natural vegetation, and drainage features of the site.

- **The application is in general conformance with the El Paso County Master Plan**
  Parks, Trails and Open Space Master Plan (2013)
  Pursuant to the 2013 El Paso County Parks, Trails and Open Space Master Plan, the proposed Kane Ranch Regional Trail intersects the Project area. The Project cannot meet the *Parks, Trails and Open Space Master Plan,* an element of the Your El Paso County Master Plan, as the Project does not depict or ensure for the regional trail alignment due to safety concerns and future land use planning goals that CSU has for the property. It is the Applicant's understanding, in working together with El Paso County Parks Department, CSU, and El Paso County PCD, that CSU, in future planning efforts for the remainder of the subject property, will work in good faith with El Paso County Parks Department to determine whether CSU can safely and reasonably accommodate a regional trail corridor on the subject property. Additionally, the El Paso County Parks Department intends to adopt a new Parks, Trails and Open Space Master Plan in 2022, which will reflect modifications to the Kane Ranch Regional Trail plan resulting from the coordination with CSU during the Pike Solar WSEO and 1041 process.

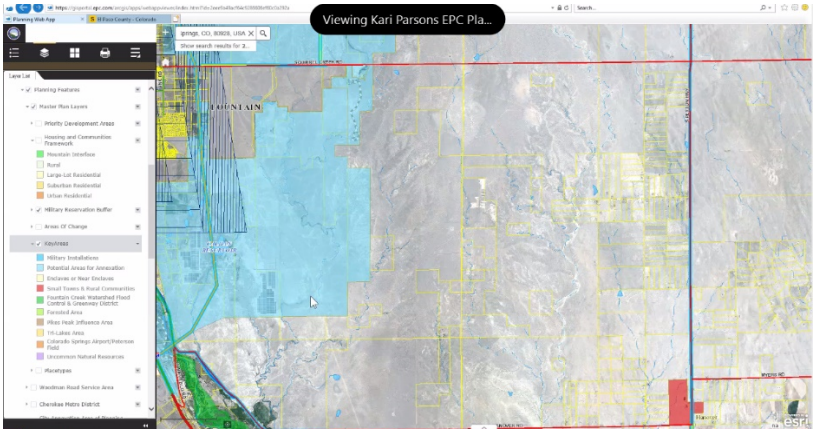
  With the future Kane Ranch Open Space identified by the Parks and Trails Department adjacent to the northeast of the Project site, a Visual Simulation **(Appendix AC)** has been submitted demonstrating that the project will not result in significant visual impacts to the local community or neighboring public recreational spaces. Finally, the Project site will be located outside of any proposed development plans of the City of Fountain Parks Department and the City of Colorado Springs Parks Department.

  Notwithstanding the foregoing inconsistency with the *Parks, Trails and Open Space Master Plan*, the Project is in general conformance with the *Your El Paso Master Plan* (referred to herein as "Master Plan") and other adopted Plan elements. Specifically:

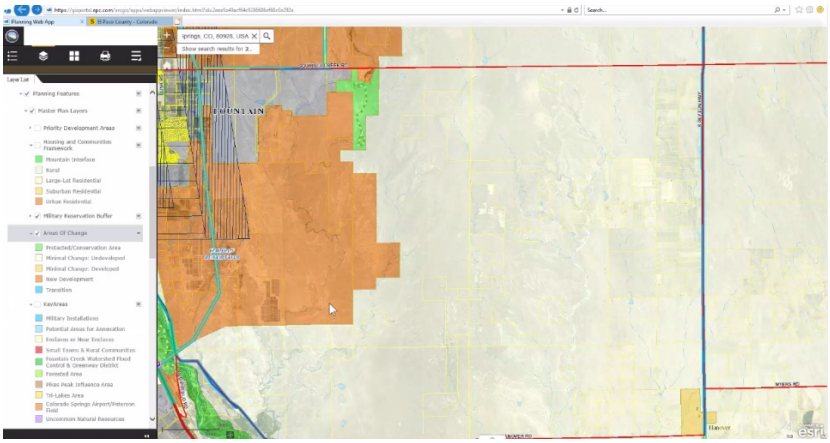
  Master Plan Implementation: Guidance for Evaluating Land Use Applications

  - *Is the proposed use located within a Key Area? If so, how will the proposed use affect the unique identity or character of the Key Area?*
    The project is within the Key Area "Potential Areas for Annexation". This area has been identified as a potential area for annexation into the City of Fountain. Being that the project location is outside of the urban and residential developed area of Fountain, and adjacent to the Fountain Landfill and existing utility infrastructure, the proposed Project has been well sited to complement existing surrounding uses, and in turn, would strengthen the existing unique identity or character of the Key Area. The nature of the Project being a solar energy facility, producing minimal to no odor, sound, light, or other nuisance to surrounding properties, make it an appropriate use alongside the existing public utility and waste management services. Should this area indeed be annexed and developed, it is likely that this portion of the Key Area would naturally be focused and maintained for siting large and public infrastructure land uses.

    "Potential Areas for Annexation" Key Area Designation on County's GIS Map:

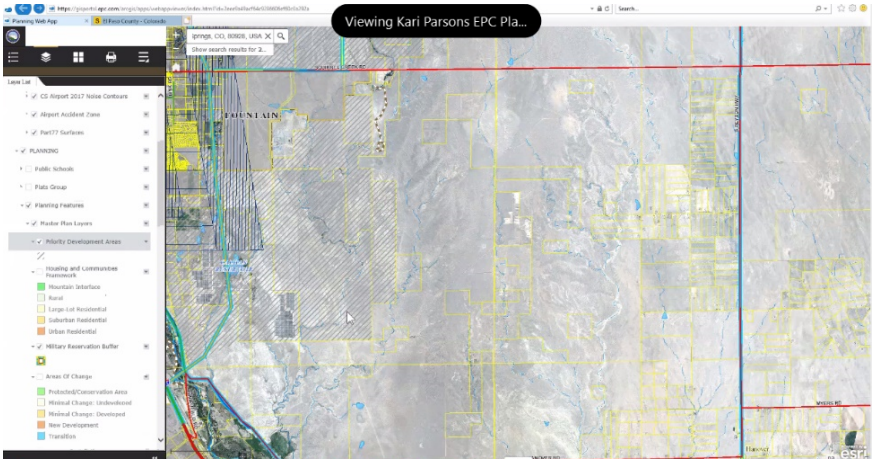


"New Development" Area of Change Designation on County's GIS Map:



- *Is the use located within a Housing Priority Development Area? If so, is the proposed use one of the identified housing types for the area?*
  The Project is located within the Fountain Area Housing Priority Development Area identified within the Master Plan. As shown and discussed on Page 53 of the Master Plan, the city of Fountain has the potential to expand south and east, and as such the Project's location should be considered for suburban residential development in order to match the development pattern of the City. While the Project's use is not the identified suburban residential use or housing type, the Project is a necessary component to accommodating the anticipated population growth by providing a needed public utility. Further, the Project area is already characterized by the adjacent Fountain landfill and utility infrastructure, resulting in the Project's use being consistent with the adjacent uses and furthering several of the Master Plan's recommendations to collocate certain types of uses as a means to conserve open space and preserve community character in other areas served by these types of projects.

"Fountain Area" Housing Priority Development Area Designation on County's GIS Map:



- *Is the use located within a Commercial Priority Development Area? If so, is the proposed use one of the identified commercial uses for the area?*
  The Project is not located within any Commercial Priority Development Area identified within the Master Plan.

- *Is there existing infrastructure to which the proposed development can connect? If so, is connection proposed and how will it be accomplished? If not, is there a plan for future extension of infrastructure to the property?*
  The Project is sited adjacent to, and designed to utilize, existing infrastructure to which it can connect, consistent with Master Plan Objective HC2-1 and its Guidance for Evaluating Land Use Applications. The Project site, designed in a safe and efficient manner, will be located on Utilities-owned property next to the Williams Creek Substation and other existing solar facilities. The Project design will reduce overall impacts and create efficiencies in the design by limiting the overhead transmission line to a short distance of approximately 1,300' from the Project substation to the Williams Creek Substation. In order to construct the Project, temporary power will be required and negotiated with MVEA from an existing power line nearest to the Project substation location in order to limit construction impacts. Additionally, as noted in the Master Plan on Alternative Energy, "energy generation should be considered and appropriately sited in the county as opportunities arise". The Pike Solar Project will bring an additional 175 megawatts (MW) of solar energy onto the Colorado Springs Utilities (CSU) electrical grid. The Pike Solar Project is poised to satisfy CSU Utilities customers' increasing demand for energy, paired with the state's renewable energy generation goals.

- *Does the development trigger the need for pedestrian or multimodal connections and are such connections being proposed?*
  The Project's development does not trigger the need for pedestrian or multimodal connections, as the Project will be an unmanned facility during operation (except for maintenance needs), will not generate a residential density increase, and will not otherwise attract or draw people to the area. For these reasons, the development does not trigger the need for pedestrian or multimodal connections.

- *Does the proposed use/development incorporate appropriate conservation design principles as identified in the Master Plan?*

  Conservation design principles uses development patterns that aim to preserve contiguous areas of open space and protect environmental features and areas by grouping development together. While this reference was made within the Master Plan to discuss residential clustered development, this approach and aimed objective are relevant to the Project. The Project groups development together by siting the utility infrastructure together with existing utility and public infrastructure development. The Project has been sited and designed to meet the growing population's energy needs while collocating and concentrating the public infrastructure uses together with its adjacency to the Fountain Landfill and other CSU-owned infrastructure.

- *Will the proposed use/development further the County's objective of meeting the Vision, Principles, Goals, and Objectives of the Master Plan?*

  The Project will promote and contribute to meeting the County's objective of meeting the Vision, Principles, Goals, and Objectives of the Master Plan. The Master Plan's Vision is centered on meeting projected growth in a strategic and sustainable way. The Project contributes to the County meetings its vision by providing the City and County's residents with needed power through a clean, renewable energy source (during a time of additional energy demand with the decommissioning of the City's coal power plant) and doing so through a development which is collocated and clustered with existing electrical utility infrastructure. Additionally, the Project works to broadly meet the Community Facilities and Infrastructure category of Goals & Principles outlined within the Master Plan. Specifically, the Project furthers Goal 5.1, which calls on coordination with agencies to provide high-quality community facilities, services, and infrastructure to enhance quality of life, and Goal 5.3, which calls to ensure adequate provision of utilities to manage growth and development.

  Additionally, the Master Plan's Alternative Energy section identifies renewable energy as an opportunity within the County that should be considered as opportunities arise (Pg. 108 of the Master Plan). The Pike Solar Project is specifically called out within this portion of the Master Plan.

- *Does the proposed use/development support the Implementation Objectives and Specific Strategies of the Master Plan?*

  The Project supports the Implementation Objectives and Specific Strategies of the Master Plan. Below is an example of an Implementation Objective and Specific Strategy supported by the Project:

  Goal E2:

  Promote sustainable best practices with regard to development and infrastructure.

  The Project supports this Goal by proposing a sustainable, clean energy generation facility use through the efficient siting and development approach of collocating and concentrating the use in an area that is already developed for utility or other public facilities such as the Fountains Landfill.

  ***Objective E2-3**: Promote alternative products and services that substitute for environmentally damaging ones.*

  The Project supports this objective by promoting clean, renewable energy as an alternative power source that substitutes, and has the potential to dis/replace, traditional fossil fuel energy sources. The transition toward clean, renewable energy is of utmost importance in combating climate change and

relieving local communities' populations from the health and environmental impacts of traditional power plants (like the Martin Drake Power Plant).

Specific Strategy: *Conservation design should be considered and evaluated alongside development considerations such as land use, zoning, traffic, infrastructure, and utilities as part of any development review and approval process in the County.*

The Project supports this Specific Strategy as part of the implementation of Objective E2-3 and Goal 2 with its alignment with conservation design principles. To reiterate the above response regarding the Project's use of conservation design principles, conservation design principles use development patterns that aim to preserve contiguous areas of open space and protect environmental features and areas by grouping development together. The Project has been sited and designed to meet the growing population's energy needs while collocating and concentrating the public infrastructure uses together with its adjacency to the Fountain Landfill and other CSU-owned infrastructure.

Master Plan Implementation: Guidance for Evaluating Land Use Applications, Additional Factors to Be Considered

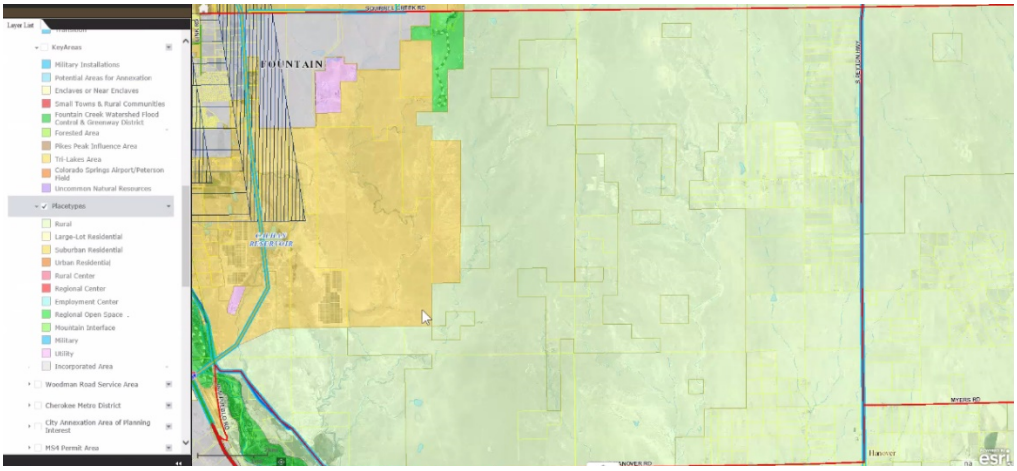
- *Larger Land Area – There are several individual large parcels as well as situations in which multiple smaller adjacent parcels are all owned by a single landowner. These parcel configuration and ownership situations create desirable opportunities for siting larger land uses, some of which may trigger the requirement for approval of a variance of use request. Multiple parcels under the same ownership, for example, could be consolidated to support and mitigate the impacts typically associated with large-scale land uses, such as energy generation facilities, landfills, mineral extraction operations, or concrete batch plants*

  The Project is consistent with this factor. The two parcels comprising the Project area are large in scale and under the same ownership, making the site ideally suited for energy generation, a large land use, and in turn allowing for the mitigation of impacts (such as visual impacts and neighborhood character) typically associated with large-scale land uses such as energy generation facilities. Further, the Project's location adjacent to the Fountain Landfill, the Palmer Solar facility, and various CSU infrastructure, together make these parcels a suitable location for the Pike Solar project.

- *Well-Integrated within Established Placetype – When land use requests propose a use that is different than what a respective Placetype typically anticipates, the siting, scale, intensity, setbacks, and aesthetic nature should be evaluated to determine if the use can be appropriately integrated into the surrounding area. Where the proposed use is a desired use but exhibits some degree of use-to-use incompatibility, enhanced methods of buffering and screening should be considered and implemented, as appropriate, at a scale that ensures reasonable mitigation of anticipated negative impacts.*

  The Project is located within the Suburban Residential Placetype. As noted above, the Project is ideally situated adjacent to existing large-scale utility and public infrastructure uses. Both of these existing adjacent land uses are also located within the Suburban Residential Placetype. As such, while the project's use is different than what this Placetype typically anticipates, the proposed use is consistent in nature and scale with the existing land uses of the immediately surrounding area. As such, the Project is sited and proposed in an ideal location, where concerns of use compatibility and negative impacts due to same are avoided by virtue of the existing character and surrounding uses.

"Suburban Residential" Placetype Designation on County's GIS Map:



Master Plan Objective HC2-1: development should be prioritized to efficiently utilize and extend existing infrastructure...
As noted above, the Project is sited and designed to efficiently utilize and extend existing infrastructure. There is existing electrical utility infrastructure surrounding the Project area, including the recently permitted and developed Palmer Solar project. The Pike Solar project will build upon and effectively expand existing utility infrastructure, which in turn also meets and promotes sustainable development and growth concepts by concentrating and clustering utility-focused development in a single area, thereby alleviating pressures on other areas in the County for similar utility development.

Infrastructure, Alternative Energy - Page 108
The Master Plan specifically announces the Pike Solar Project within the Alternative Energy Subsection of the Infrastructure Section (Pg. 108). The Master Plan identifies solar energy as sustainable, renewable, and especially plentiful in El Paso County. The Pike Solar project is poised to deliver clean power to thousands of County residents, and directly contribute to CSU in better serving its customers through new, cleaner technologies.

Master Plan Objective HC2-6: carefully analyze each development proposal for their location compatibility with the natural environment, and cohesion with the existing character.
The Project plans have been intentionally designed to reduce/mitigate the environmental impact to the wetlands, wildlife, and cultural resources of the Project area and surrounding lands. The Applicant will make environmental quality a priority by reducing impacts to most of the water features by specifically engineering/designing crossings through wetlands. The Project design will specifically avoid cultural locations and the wildlife plans will minimize impacts to wildlife and associated habitats. The Project requested and received a Jurisdictional Determination from the US Army Corp. of Engineers and it was determined that there are no Waters of the US within the boundaries of the Project.

The attached **Appendix P- Zoning Map** shows the current zoning throughout the Project area, which currently has three different zone types including Rural Residential- 5 (RR-5), Agricultural-5 (A-5), and Agricultural-35 (A-35). Much of this zoned land is owned by the State of Colorado, Unincorporated El Paso County, and the City of Fountain Sanitation Department. The Project site is also bounded by a small portion zoned as Industrial- 3 (I-3). The Project site is not intended to interfere with existing

neighborhoods and is intentionally designed further away from residential homes in effort to minimize impacts on the community's residential areas.

The Project site was selected for its proximity to the point of interconnection at Utilities' Williams Creek Substation and because the land is owned by the City of Colorado Springs on behalf of its enterprise Colorado Springs Utilities. Also, the Project has few direct neighbors other than the Palmer Solar Project and an extensive network of transmission facilities and lines.

Water Master Plan (2019)

The Project is consistent with the County's adopted Water Master Plan (WMP) and, in alignment with community feedback received, the Applicant will work to minimize impacts of water usage to the Project. Overall, the proposed Project will be a low water-use development. During the project construction phase, an estimated 4,475,000 gallons of water will be required for the Applicant's dust mitigation efforts. The Applicant is working with CSU to utilize onsite water via the Williams Creek Pump Station, located in Region 7 (see Appendix Z- Water Service Letter). The Project is sited within both Regions 6 and 7 under the WMP. A tower will be placed for trucks to fill up water, which will be connected to an above ground pipe/fire hose, which will run from it to the hydrant on other side of the fence outside of the Williams Creek Pump Station where a meter/valve for connection will be installed. The contractor will track daily water usage and submitted monthly reports. Water will only be required during the construction phase to mitigate dust and maintain air quality. After the Project becomes operational, water needs are not anticipated. During construction, personnel will use portable sanitary units and carry in drinking water for personal use. The Project will not have an adverse effect on water and sewer demands. Sanitary and other wastewater will not be released into Waters of the U.S.

The Project, once operational, will have negligible impacts on water quantity or quality. In the US and Europe, more than half of the water drawn from nature is used for power generation. Traditional fossil fuel power plant facilities require considerable water consumption for operation and maintenance, such as to clean and process the fuel and to cool the power plants via constant water circulation. Additionally, hydroelectric power plants evaporate an average of 18 gallons of fresh water per kWh used by the consumer. Water consumption required for the Pike Solar project pales in comparison; the Project will require minimal, if any, water once in operation. The estimated 4,475,000 gallons of water required during the Project's construction phase is for dust mitigation efforts and will only be temporary demand. Considering the foregoing, the minimal water usage required for the Pike Solar Project meets the goals and policies identified in the Water Master Plan.

55% of El Paso County's water sources of supply is imported renewable water, much of which (35%) is provided by CSU. The Pike Solar Project will receive water from CSU's Williams Creek Pump Station during the construction phase. As noted in the WMP, CSU has taken innovative steps to assure renewable water deliveries to their customers. As such, the Project, by way and virtue of CSU standard practice, directly meets and aligns with WMP Policy 4.2.2 to encourage renewable water supplies and reduce the dependency on non-renewable water supplies, as well as Goal 5.4 to promote the long-term use of renewable water.

The Project's close proximity to the existing Williams Creek Pump Station, owned and operated by CSU, will allow for the Applicant to utilize existing infrastructure to receive the water necessary during the

Project's construction phase. This aligns with Policy 5.2.4 to encourage the locating of new development where it can take advantage of existing or proposed water supply projects that would allow shared infrastructure costs.

Water usage related to, or resulting from, the Project will not be needed at full buildout (year 2060). As such, the Project will not contribute to, or impact, the current estimated build-out (2060) demand as described in the Water Master Plan. Rather, the extremely low-water use nature of solar power facilities effectively reduces and absorbs the projected regional demand for water at full build-out, as solar projects such as Pike Solar contribute to the decommissioning and replacement of traditional power plants which are comparatively high-water consumers.

2040 Major Transportation Corridor Plan (2016) (MTCP)

The Project will be required to comply with the County's Road Impact Fee Program. Pursuant to discussions with the County's reviewing Engineering Staff, the following road impact fee has been estimated in accordance with the following formula: 1.62 x $3,372 (public/institutional use) = $5,462.64. This information is included herein as requested.

It is a top priority of the Applicant to develop a mutually agreed upon transportation plan by working with the County, City of Fountain, CDOT, Fire Department, and interested parties in the community. The Applicant would like to follow the El Paso County 2040 Major Transportation Corridor Plan as well as the City of Fountain Traffic Routes. In following these guidelines and working with the interested parties, the Applicant has also agreed to conduct road condition surveys pre- and post-construction activities and to pay its proportional share for Pike Solar construction travel impacts to the two haul routes to keep the roads used by the Applicant well-maintained. Details surrounding these studies can be found in **Appendix AK- Road Conditions Survey Work Plan** which describes an approach and outlines methodologies to evaluation conditions of the paved roadways for the proposed construction travel routes as well as efficiently count representative samples of vehicles and vehicle classes along the two travel routes to understand local heavy traffic and project traffic. Finally, this work plan provides a means to assess the degradation of the routes over the course of construction and the proportion of degradation that is attributable to the construction of Pike Solar.

Proposed Access Locations

The Applicant has been working with the County, Colorado Department of Transportation ("CDOT"), and the City of Fountain on creating cohesive Traffic and Haul routes. The proposed construction travel plan was presented in the Early Assistance Meeting on October 21, 2020. Following this meeting, the Applicant has worked with the County, City of Fountain, CDOT, and the Hanover Fire Protection District in several follow-up discussions about traffic plans. The two access points are depicted on **Appendix AI- Haul Route Map.** This map identifies the two main routes for the planned construction traffic. Old Pueblo Road is depicted as a rural collector on the on the MTCP 2040 Roadway Plan (Classifications and Lanes). The analysis and recommendation made within **Appendix AJ - Traffic Memo** do not identify improvements to this road as being necessary for this development. The Traffic Memo also notes that the Project will not impact any of the roads that are highlighted in the 2060 Corridor Preservation Plan.

The first, being called the Green Route, designed for daily personnel traffic, is designed for traffic to travel from I-25 through the City of Fountain designated truck routes to Squirrel Creek Road, and entering the project site from the North near the landfill. The second route, being called the Orange Route, designed for hauling the majority of the project equipment including modules and racking, is designed for traffic to travel from I-25 to Old Pueblo Road, east on Birdsall Road, and entering the project site from the West of the project onto a temporary road access route. Details regarding the roads and haul plans and estimated traffic are outlined within **Appendix AJ- Traffic Memo** attached.

In following further county guidelines and working with the interested parties, the Applicant has also agreed to conduct road condition surveys pre and post-construction activities and to pay its proportional share for Pike Solar construction travel impacts to the two haul routes to keep the roads used by the Applicant well-maintained. Details surrounding these studies can be found in **Appendix AK- Road Conditions Survey Work Plan** which describes an approach and outlines methodologies to evaluation conditions of the paved roadways for the proposed construction travel routes as well as efficiently count representative samples of vehicles and vehicle classes along the two travel routes to understand local heavy traffic and project traffic. Finally, this work plan provides a means to assess the degradation of the routes over the course of construction and the proportion of degradation that is attributable to the construction of Pike Solar.

The Applicant entered into a Development Impact Mitigation Agreement with the County and City of Fountain during the WSE-O process which addresses the impact on roads resulting from development of the Project**.**

Additional Information Regarding Project and Impact

Air

The Project will not result in adverse impacts to air quality. During the construction and operation phase of the Project, mitigation efforts will exist to reduce dust emissions. Pursuant to the El Paso County LDC 6.3.1, the Applicant has included **Appendix Q- Air Quality Management Plan** that describes efforts to adopt Best Management Practices, minimizing fugitive dust during the construction phase of the Project. Some of these efforts will include applying water on haul roads and equipment and excavation faces, restricting vehicle speeds to eleven miles per hour, and suspending activities during high-wind events. Additionally, sediment control practices such as targeted grading will exist to help minimize fugitive dust (see also **Appendix R- Grading and Erosion Control (GEC) Plan**). The Applicant submitted an Air Pollutant Emissions Notice (APEN) in May 2021 to the Colorado Department of Public Health and Environment (CDPHE. The APEN construction permit was deemed administratively complete and approved. Please refer to the APEN approval notice included in the WSE-O submittal package.

Water

Several steps will be taken to protect water quality on the Project site. The Non-Wetlands Features and Wetlands Report dated October 2, 2020 **(see Appendix H)** identifies possible wetland locations where the USACE may exercise Jurisdiction. This was Report was submitted to the USACE **(see Appendix K)** The final response was that no jurisdictional wetlands or waters were found. No further action is required. The road crossings will be designed as "no-rise" specifically to preserve the wetland and floodplain features without contributing any pollutants into the waters.

Because the Project will be designed specifically to reduce/avoid impacts to hydrologic flow to groundwater, wetland areas, and flood hazard locations, the Applicant has conducted studies, rendered reports, and developed plans and identified methods for appropriate drainage and flood protection.

The Grading and Erosion Control Plan (**Appendix R**) and Drainage Report (**Appendix S**), which will comply with the El Paso County Drainage Criteria Manual, identify the Applicant's anticipated drainage and erosion control measures to protect water quality. When temporary stream crossings are removed, the disturbed areas shall be covered with topsoil, seeded, and mulched and covered with geotextile, or otherwise stabilized in a manner acceptable by El Paso County Planning & Community Development Department. This practice will also be applied to any check dams and sediment basins, which are only to be removed once upstream areas have been stabilized with vegetation. Please refer to the notes within the grading and erosion control plan enclosed within this application package for complete details on planned restoration activities of riparian areas following construction. Additional reports including a Stormwater Management Plan (SWMP), following the Best Management Practices (BMP) guidelines, and an Erosion and Stormwater Quality Control Permit (ESQCP) are enclosed within this submittal package. CORE Consulting has prepared these reports in compliance with the County regulations and manuals.

Additionally, the Applicant submitted a letter to the Pike's Peak Building Department regarding the designed crossings that will intersect the 100-year floodplain. They responded by confirming that our Project will fall under the Code RBC313.19.2 of Nonresidential Construction **(Appendix O– PPRBD Correspondence)**. The Project will not be considered a critical facility, and the planned crossings will only require permits – which will be submitted following this application.

Light

To further ensure the safety to the community **Appendix AB- Electromagnetic Interference Report** (EMF) was rendered, which illustrates that the Project will not adversely affect the community through radiation, emission levels, and electromagnetic interference with radio transmissions.

To illustrate the potential impacts of the Project design, the Applicant has included the **Appendix AC-Visual Simulation**, generated by Core Consulting, which shows a simulation of the design from various location. Results from this report indicate that there will not be significant issues related to the surrounding views for neighboring communities and the project will not inhibit views of the mountains.

Additionally, an **Appendix AD- Lighting Plan** was also included in this application, which details when lighting will be used, both during the construction phase and operational phase, and the lighting's potential impacts on neighboring properties. Lighting will be scarcely needed during the construction phase as the Project will be constructed during natural daylight hours. Once the Project is operational, lighting will be limited to motion lighting and limited to O&M facility lighting as well as interior located equipment.

Noise

The Project, once operational will produce negligible amounts of noise. Because there will be no permanent on-site employees, no traffic or personnel noise will be anticipated.

During the construction phase of the Project, several procedures will exist to control noise. The working hours for the site will be 7 a.m. to 7 p.m., Monday through Saturday – possibly, but rarely on Sundays. The Project will be located over a mile and half from residences. The traffic and haul routes have been designed around approve local haul routes and, in an effort, to minimize impact to the local community

and to meet noise thresholds. The Applicant will abide by applicable noise guidelines in the LDC 6.2.7 and will not exceed the maximum allowable 80 dBA for the anticipated construction activities. On-site employees will be instructed to abide by the Ordinance Concerning Noise Level 02-1 and the guidance stipulated in the El Paso County LDC.

Odor
No adverse odors will result from the proposed Project.

Hazardous Materials
The Applicant has included the Phase I Environmental Site Assessment report dated October 21, 2020 pertaining to the Project area **(see Appendix G)**. The report findings indicate no presence of hazardous substances or petroleum products defined as Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), nor Historical Recognized Environmental Conditions (HREC) were found on the Project area.

A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared for construction. The SPCC Plan will contain information regarding training, equipment inspection and maintenance, and refueling of construction vehicles with an emphasis on spill prevention. This plan will be implemented, and a hard copy will be located on-site during construction. The Applicant's finalized SPCC Plan will be supplied with the Site Development Plan application following this application.

Personnel will follow the project guidelines in the Operations and Maintenance Plan **(Appendix AH).** This plan will include landscape inspections to limit fire hazards, hazardous materials training for personnel and other systems monitoring.

There will also be a Decommissioning Plan **(Appendix Y)**, which will detail the proper disposal methods of components at the termination of Project operations.

Welfare
The purpose of this Project is to support the community of El Paso County in developing a renewable energy source that will interconnect on Utilities' grid. This Project will provide a more sustainable and efficient energy source to help accommodate the ever-growing community. The Project will also benefit local business in Fountain and Colorado Springs, including the food service industry, lodging, fuel stations, equipment rentals, and hardware/tool supply vendors. Additionally, the Project will provide increased tax revenue. Perhaps the Project's most impactful and obvious long-term benefit to the growing community will be providing clean energy capable of powering 58,200 homes.

Safety
One of the Project's many safety and efficiency features will be fencing built around the Project's components and module sections. This fencing will provide added safety to the community.

Environmental
The Applicant will approach its initial construction and subsequent operations to mitigate any negative environmental effects. With a primary goal of the Project design being to minimize environmental impacts and disruption to the existing environment, the Applicant has conducted several environmental studies which have determined the impacts and mitigation efforts as to wetlands, biological resources, wildlife, and cultural artifacts within the Project area.

Wildlife & Vegetation

Efforts have been made in the Project design to identify and consider the presence of wildlife, vegetation, noxious weeds, and wetlands within the Project area. The Applicant has coordinated with various Federal, State, and Local entities to ensure that guidelines are met and adverse environmental impacts are minimized. In addition, the landscape plan depicts the revegetation and seed mix.

Wildlife

Several efforts have been made to protect wildlife within the Project area. A Biological Resources Report **(Appendix F)** was rendered on October 19, 2020 by Pinyon Environmental, Inc. The property has been predominately used as grazing lands and is located in a rural area. The report findings indicate that there are no critical habitats for any federally listed species that are categorized as threatened or endangered. Additionally, the Applicant notified the USFWS of the report's findings **(Appendix I- USFWS Correspondence)**, and in a response dated December 7, 2020, they have indicated no concerns associated with the project design and report's findings.

The Biological Resources Report does identify the following state-listed species categorized as 'threatened' and/or 'species of concern' along with corresponding recommended actions:

- State-Listed Threatened Species:
    - Burrowing Owl- Conduct Prairie Dog removal when the Burrowing Owls are absent between October 31 and March 15.
- State-Listed Species of Concern:
    - Bald Eagle- No nests were located within a half-mile of the project site, however, should they be found prior to construction, a quarter-mile buffer would need to be implemented to avoid encroachment on the habitat.
    - Ferruginous Hawk- None were observed within the project area, however, should they be found prior to construction, a half-mile radius would be required around an active nest
    - Mountain Plover- None were observed within the project area, however, should the Applicant decide to minimize potential for Mountain Plover, vegetation-clearing and ground disturbance should be planned between August 31 and April 1.
    - Black-Tailed Prairie Dog- Prairie Dog removal will be required for the Project Site and require coordination with CPW.
    - Swift Fox- Efforts to mow the shortgrass prairie vegetation and fill burrows within a quarter mile of the proposed ground disturbance should occur between June 15 and March 15.
    - Northern Leopard Frog- None were located at the Project site and no action is required.

To confirm compliance, the Applicant supplied these report findings and recommended actions to CPW. The Applicant will adopt measures in the construction, operation, and maintenance of the Project that adheres to the above-mentioned recommended actions. CPW submitted a letter of concurrence **(Appendix J)** in recommendations for surveys and methods of handling wildlife and associated habitats.

Vegetation

The Project area is a rural undeveloped location consisting of shortgrass prairie habitat and rangeland areas. Site studies have not documented any sensitive or listed plant species in the analysis. The current vegetation on the site is dominated by species such as common sunflower, field bindweed, kochia, lambsquarters, western wheatgrass, blue grama, buffalo grass, cholla, fourwing saltbush, leafy false goldenweed, and prickly pear cactus. These vegetation species are identified in the Non-Wetland Water Features and Wetlands Report (attached as **Appendix H)**. Construction will temporarily impact this vegetation, but re-vegetation efforts are planned following project development. Disturbances will be limited to the planned development area with the remaining leased property left in its original condition. The Project will be designed around a reservoir expansion area that will remain untouched. Vegetation maintenance efforts will be addressed by following the Integrated Noxious Weed Management Plan **(Appendix X)** guidance and through mowing. The Decommissioning Plan **(Appendix Y)** details how the lands surrounding the project will be restored through re-seeding and reclamation efforts.

Noxious Weeds

An Integrated Noxious Weed Management Plan was developed **(Appendix X)** and rendered on December 14, 2020. This report, which has been cross-referenced with the El Paso County Noxious Weed Management Plan, lists the following findings of Noxious Weed types and associated management goals:

- List A species:
    - No species listed within the report
- List B:
    - Hoary Cress- Pursuant to the CDA and the El Paso County Noxious Weed Management Plan, this is a priority for elimination and such actions are recommended.
    - Canada thistle- The CDA and the El Paso County Noxious Weed Management goal for this species is suppression.
    - Salt Cedar- The CDA and the El Paso County Noxious Weed Management goal for this species is suppression.
- List C:
    - Field Bindweed- Management and mitigation efforts for List C species is not required by law and management is not recommended.

Best Management Practices have then been identified to manage said Noxious Weed species. Mechanical and Chemical methods shall treat List B species. The Applicant will implement the following treatment recommendations:

- Hoary Cress elimination techniques include mowing repeatedly throughout the spring and summer in combination with herbicides during the early spring and summer.
- Canada Thistle has a suppression recommendation that requires mowing every 10-21 days, coupled with during the spring to bloom stage and in the fall immediately following mowing.
- Salt Cedar suppression requires cutting down trees and applying herbicides to the stump and roots systems.

Wetlands

As part of the Applicant's pre-development actions, Pinyon Environmental, Inc. rendered The Non-Wetland Water Features and Wetlands Report dated October 2, 2020, which identifies wetlands and potential wetlands throughout the Project area **(Appendix H)**. The Applicant provided this report to the USACE in a letter dated October 2, 2020. The final response was that no jurisdictional wetlands or waters were found, and this correspondence is included. No further action is required.

Historical Resources

A Class I Cultural Resource Report desktop review was conducted, and a report rendered on October 2, 2020 **(see Appendix AA)**, identifying the cultural and historic resources within the Project Area. The report identified three resource locations where additional studies would be required prior to any construction activities. Two of the locations (5EP.4830 and 5EP.4832) are identified as Archeological Resource Types that "Need More Data." The third location (5EP.4849) is an Archaeological Resource Type that is categorized as "Officially Eligible." The current Project design does not intersect or interfere with these identified locations, and the Applicant will abide by the recommended actions by fencing and avoiding these locations, preventing interference.

As an additional precaution, the Applicant supplied the Office of Archeology and Historic Preservation (OAHP) with the reports, letters, and available information and the Applicant's proposed response plans. In the correspondence attached, the Applicant requested for the OAHP to review the Class I Cultural Resources Report. On December 28, 2020, the Applicant received a letter from the OAHP, which verified that (i) the resources in the report do not pertain to the per view of their review, (ii) Section 106 of the National Historic Preservation Act and the Colorado State Register Act (Colorado Revised Statute (CSR) 24-80.1) does not apply, and (iii) the Project design will not interfere in any potential cultural resources on the property.

Existing and Proposed Facilities

Existing Facilities: The Project is located adjacent to multiple high voltage electrical transmission lines, the Williams Creek Substation, and Palmer Solar. The Project will interconnect at CSU's Williams Creek Substation. This was intentionally designed to avoid visual impacts derived from lengthy transmission line runs. Currently there are no other existing facilities on the proposed site.

Proposed Facility: The Pike Solar Project will be a solar PV system that will be composed of photovoltaic modules that convert the sun's radiant energy into electricity. The modules will be mounted on horizontal single-axis tracking racks that rotate from east to west to track the sun over the course of each day. The modules will be electrically connected in series strings to achieve a system DC design voltage of 1500V DC. Cables from the module strings will be buried in trenches and combined with DC combiner boxes located strategically throughout the field. The DC combiners will connect multiple arrays in parallel, from which point the electricity will be conducted via cables to the inverters, which convert the DC power generated by the modules to grid-synchronized AC power. Step-up transformer(s) will raise the inverter AC output voltage to 34.5kV, and the Solar Project output will pass through an AC collection system to the Pike Solar substation and ultimately to the Point of Interconnection (POI) at the Williams Creek Substation via a 1,400-foot 230kV proposed overhead transmission line.

Williams Creek is an existing 230kV ring bus substation that will be transitioned into a breaker and a half in bays 2, 3, and 4 with the installation of seven circuit breakers. This reconfiguration will accommodate a renewable energy provider connection and a loop in of the existing 230kV Nixon-Claremont transmission line, including one new transmission tower within the existing alignment and easement. The substation plot does not require expansion and updates to drainage, grading, ground grid, cable trench, fencing, yard rock, conduit, cabling, steel, bus, instrumentation, protection and control, and substation equipment will only be installed or modified as required for the installation of the new equipment. The Williams Creek Substation is designed primarily as an interconnection or switching substation, not a load serving substation, and design capacity is not technically an issue at switching substations. The main design consideration at switching substations is the number of interconnection positions for generation connections and/or transmission line connections necessary for reliable power delivery. No work for other future expansion will be considered. There will be ten separate laydown areas totaling 60,407 square yards interspersed throughout the project along site access roads within fenced-in areas.

Proposed Facilities and Anticipated schedule of development

One solar energy generation facility is proposed for the Project. Construction will occur in one phase until complete. Below please find a table identifying the anticipated schedule of development:

Milestone	Start	Finish
1. Major Permit Approvals (WSE-O, 1041)	Q1 2021	Q1 2022
2. Secondary Approvals (Site Plan Review, PPRBD permit)	Q4 2021	Q3 2022
3. Pre-construction (surveys, engineering)	Q3 2020	Q3 2022
4. Site Improvements, Substation and Project Construction	Q3 2022	Q4 2023
4.1 Civil Construction (site grading; roads)	Q3 2022	Q4 2022
4.2 Post Rack Module Install	Q3 2022	Q3 2023
4.3 Electrical Install	Q3 2022	Q3 2023
4.4 Construction of Interconnection Facilities	Q2 2023	Q4 2023
5. Initial Energization	Q4 2023	
6. Plant Commercial Operation	Q4 2023	
7. Seeding and close out Stormwater Permit	Q4 2022	Q4 2023
8. Estimated life of the Project/1041 Timeframe	2023	2058
9. Final Decommissioning Plan submittal	Q4 2058	
10. Begin Active Revegetation and Site Restoration	Q2 2059	

Thank you for your full consideration of this application.

Sincerely,

Brian Vickers, Project Manager
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