

PIKE SOLAR LLC



Appendix M- OAHF Correspondence

Claire Gerrish

From: Tobias - HC, Mark <mark.tobias@state.co.us>
Sent: Monday, December 28, 2020 10:38 AM
To: Claire Gerrish
Subject: HC_79055_COM_JUWI_PIKE CULTURAL REVIEW REQUEST
Attachments: HC_79055_COM_JUWI_PIKE CULTURAL REVIEW REQUEST.pdf

From: History Colorado, Office of Archaeology and Historic Preservation

Attached is our letter on the subject undertaking in Adobe PDF format.

Please contact me at the below information if you have any questions.

Sincerely,

Mark Tobias

Intergovernmental Services Manager

History Colorado | Office of Archaeology and Historic Preservation

(c) 303/578-6736 | mark.tobias@state.co.us

History Colorado Center | 1200 Broadway | Denver, Colorado 80203 | HistoryColorado.org

We are now accepting electronic consultation through our secure file transfer system, MoveIT. Directions for digital submission and registration for MoveIT are available at <https://www.historycolorado.org/submitting-your-data-preservation-programs>.



Claire Gerrish
Project Planner
Juwi, Inc.
1710 29th St, Suite 1068
Boulder, Colorado 80301

Re: Development Review of Pike Solar Project (HC # 79055)

Dear Ms. Gerrish:

We received your documentation on December 21, 2020 requesting comment on the referenced project as part of El Paso County's 1041 zoning permit. As we understand there is no federal or state involvement for this project and Section 106 of the National Historic Preservation Act (Section 106) and the Colorado State Register Act (Colorado Revised Statute (CRS) 24-80.1) does not apply.

While we appreciate the proponent's due diligence to identify and avoid important properties within our state as part of its planning process, we are not able to provide specific comments other than to encourage all parties to avoid and minimize effects to significant cultural resources as practicable.

Our letter should not be interpreted as concurrence under the National Historic Preservation Act or any other environmental law or regulation. In the event that there is federal agency involvement, please note that it is the responsibility of the federal agency to meet the requirements of Section 106 as set forth in 36 CFR Part 800 titled "Protection of Historic Properties". This includes not only reasonable and good faith identification efforts of any historic properties located within the area of potential effects, but determining whether the undertaking will have an effect upon such properties. The State Historic Preservation Office, Native American tribes, representatives of local governments, and applicants for federal permits are entitled to consultative roles in this process.

If we may be of further assistance, please contact Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Dr. Holly Kathryn Norton Digitally signed by Dr. Holly Kathryn Norton
Date: 2020.12.28 09:23:22 -07'00'

Steve Turner, AIA
State Historic Preservation Officer
ST/mt



History Colorado
Office of Archaeology and Historic Preservation
1200 Broadway
Denver, CO 80203

Re: Development Review of Pike Solar Project

Office of Archaeology and Historic Preservation,

As Pike Solar LLC begins permitting for the Pike Solar Project in El Paso County, we formally request a development review from US Fish and Wildlife Service (USFWS). The Pike Solar Project, as described in the attached memo, is a 175-megawatt solar energy photovoltaic generation facility sited in southern El Paso County east of Interstate 25 and Fountain Creek. The project will provide affordable and clean energy to El Paso County and Colorado residents and businesses, while helping the State of Colorado meet its requirements for renewable energy.

Pike Solar is working with El Paso County on an application for a Wind/Solar Energy Overlay (WSE-O) and 1041 Permit. As part of these applications, we would like to include a letter from OAHP that outlines findings from a development review.

To help facilitate a OAHP review, please find a Project Memo and Exhibit “A” map for the Pike Solar Project included with this letter. We are requesting that OAHP review the current Pike Solar Project layout and associated reports and provide recommendations pertaining to the following cultural considerations:

- State Level Cultural Resources Review, Class I Cultural Resources
- Project layout associated with the Resource Type and Eligibility Assessment

Pike Solar LLC is a wholly owned subsidiary of juwi, Inc (“juwi”). juwi prioritizes coordination with State and Federal agencies in its development work to achieve optimum project design and responsible construction practices. We have conducted a voluntary cultural resource assessment with qualified third-party consultants. We included the result in this letter for OAHP review.

Please let me know if you have any questions regarding the attached memo and its enclosures or if you would like additional information to assist OAHP’s review. Additionally, we welcome the opportunity for a virtual meeting or call if OAHP would like to discuss in this project in more detail.

Sincerely,

Claire Gerrish, Project Planner
juwi Inc.
303.996.4154
cgerrish@juwiamericas.com



Project Memo

Project Name: Pike Solar

Project Applicant: Pike Solar LLC and juwi, Inc.

Project Contact: Claire Gerrish (juwi Inc.), Project Planner

Date of Memo: 11/10/2020

Project Overview:

- Size: 175 megawatt (AC)
- Technology: Photovoltaic Panels on Single Axis Trackers
- Battery Energy Storage System: 25 MW X 4 Hour
- Key infrastructure: Perimeter/security fencing, access roads, 1 substation, arrays, Operations and Maintenance Shed, Inverters, Transformers, underground electrical (distribution) line between areas
- Design: Majority of the site will consist of steel poles rammed into the ground with solar arrays connected and standing, at a minimum, approximately 3 feet off the ground
- Acres: 1,170 acres project footprint
- Location: portions of Sections 11, 12, 13, 14, 23, 24, 25, 26, 36 Township 16S, Range 65W and portions of Sections 7 18, 19, 30, 31 Township 16S R64W
- Access:
 1. Access from the north off Squirrel Creek Road on unnamed road heading south
 2. Access from the west via Birdsall Road off Old Pueblo Road to an unnamed temporary construction road heading east

Site Overview:

- Current use: Combination of grazing and vacant land with transmission lines and other electrical infrastructure
- Description of lands: Project area is generally flat with some rolling hills. Irrigation ditches and arroyos flow generally south and east towards Fountain Creek. Vegetative cover includes blue gramma dominated shortgrass prairie and cholla/saltbush shrublands. The area is used as rangeland for livestock and to grow hay.
- Historic use: rangeland use
- Elevation: 5,385-5,585 feet
- El Paso County Zoning: Rural-residential 5 (RR-5), Agricultural-5 (A-5) and Agricultural-35 (A-35)
- Construction period for the complete site: 21-24 months
- Targeted Construction Start: November 2021
- Targeted Construction Finish: December 2023

Permitting Overview and requested OAHP involvement:

- El Paso County and Local Permits
 - o Wind/Solar Energy Overlay (WSEO Rezone Amendment)
 - Status: Beginning phases
 - OAHP component: Pike Solar LLC asks for development review/recommendations/concurrence for this Application
 - o 1041 Permit
 - Status: Run concurrently with 1041
 - OAHP component: Incorporate Letter used for WSEO Application into 1041 Application
 - o Site Plan Review
 - Status: Following WSEO and 1041
 - OAHP component: Incorporate potential requirements/recommendations into design and construction activities



Pike Solar LLC and juwi, Inc. respectfully requests USFWS determination regarding the below third-party reports and recommendations.

- Class I Cultural Resources Report dated October 2, 2020 and specified locations depicted on Exhibit “A”. The below listed locations have been highlighted as priority review. They are depicted in the image but do not intersect any of the current project design plans.
 - Location 5EP.4830- Archaeological Resource Type categorized as “Needs More Data”
 - Location 5EP.4832- Archaeological Resource Type categorized as “Needs More Data”
 - Location 5EP.4849- Archaeological Resource Type categorized as “Officially Eligible”



Exhibit "A"

