

Pike Solar Project
El Paso County 1041 Application
Applicant: Pike Solar LLC
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Acronyms

AC – Alternating Current

APEN – Air Pollutant Emission Notice

CPW – Colorado Parks and Wildlife

CSU – Colorado Springs Utilities

CWA – Clean Water Act

DC – Direct Current

ESA – Endangered Species Act

FAA – Federal Aviation Administration

kV—Kilovolt

MW- Megawatt

PCD – Planning and Community Development of El Paso County

Phase I ESA – Environmental Site Assessment

PPA – Power Purchase Agreement

PPRBD – Pikes Peak Regional Building Department

PV – Photovoltaic

SCADA - Supervisory Control and Data Acquisition

SPCC Plan – Spill Prevention, Control, and Countermeasure Plan

SWMPP – Stormwater Management Program Plan

USFWS- United States Fish and Wildlife Service

USACE – United States Army Core of Engineers

WSE-O – Wind/Solar Energy Overlay

Article 4: Permit Hearing

Section 2.405: Review Criteria for All Applications

(1) Health, Welfare and Safety

The health, welfare and safety of the citizens of this County will be protected and served.

The Project's intent is to provide safe, healthy, and economical solar photovoltaic facility to connect to the Utilities' grid. Solar energy is a clean alternative for providing electricity needs to the Utilities and growing community.

The Project's design will be mindful of the health and safety. The Project is taking into account welfare of the community and environment through many studies to ensure no adverse effects on the wetlands, wildlife or health of citizens. The Project is located in rural grazing land away from many residential areas. Security fencing will be established to ensure the safety of the community.

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.

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.

The attached **Appendix AJ- Traffic Memo** goes into further detail about the traffic plan and routes to ensure that the construction of the Project will have an outlined traffic plan to minimize effects on the community.

Overall, the Project application has included several studies, correspondence and development plans to outline and ensure that the Project is in the interest of the community and operations will be conducted with safety, health and welfare for the community are in mind.

(2) Conformance with County Plans

The proposed activity is in general conformance with the El Paso County Master Plan, Water Quality Management Plan, NPDES Phase II Permit, or other duly adopted plans of El Paso County. The determination of conformance of the Project with these plans may include but is not limited to the following considerations:

- a) Likelihood that the Project will/will not cause or contribute to urban sprawl or leapfrog development**
- b) Significant changes in the amount of impervious surfaces**
- c) Contiguity of development associated with the Project to existing growth centers**
- d) Changes to unique landforms**
- e) Changes in the amount or character of open space**
- f) Changes to traffic patterns, road capacity and congestion**

The El Paso County Master Plan contains guiding documents for land use and zoning. The Project has met the guidelines under the Master Plan along with other Plans including: the El Paso County Policy Plan ("CPP"), Small Area Plans including the applicable South Central Comprehensive Plan, the Parks Master Plan, the Master Plan for Mineral Extraction, the 2018 Water Master Plan, and the Major Transportation Corridor Plan.

The location of the Project site was strategic in connecting to the pre-existing Williams Creek Substation and located near the Palmer Solar Project. The Applicant made efforts to minimize Project sprawl and consolidate the PV systems to one centralized area.

In an effort to maintain the character of the lands, the Applicant has been working to accommodate the current and future goals of the Parks and Trails department with the Applicant's own site development strategy. The Applicant has reviewed the 2013 El Paso County Parks and Trails and Open Space Master Plan and has been working with the County Parks and Trails Department to ensure that Project's design plan will be integrated with the Master Plan's goals. The email attached (**Appendix AF- Parks and Trails Proposal**) details correspondence with Park Planner, Ross Williams, who proposed the corresponding attached map as an amendment to the planned trail system. The goal of this relationship was to maintain the open space for the community and allow potential future trail development.

During the construction phase of the Project, an increase in traffic is anticipated. Mitigation efforts have been proposed for the Project in order to reduce overall impact to the community. The Project plan proposes two main haul routes for equipment and personnel (**Appendix AI- Haul Route Map**) in order to split some of the traffic into different areas. Traffic for the construction will be managed through **Appendix AJ- Traffic Memo** which estimates a volume between 150-202 vehicle trips per day during construction. In effort to maintain the quality of the roads for the community, the Applicant is also conducting a survey (**Appendix AK- Road Conditions Survey Work Plan**) to evaluate the roads' present conditions and plans to maintain the roads' conditions by providing compensation to offset the Applicant's proportional contribution to road damage. Upon completion of the Project, this will be an unmanned facility and there will little traffic impact.

(3) Feasibility

The Project is financially feasible. The determination of financial feasibility of the Project may include but is not limited to the following considerations

- a) The business plan submitted by the applicant**
- b) Relevant bond issue, loan and other financing approval or certifications**

Initial development will be financed by juwi AG, the parent company of the Applicant. Going forward, the Applicant has secured a Power Purchase Agreement and will work toward financing structures for long-term ownership of the project. The Applicant has worked a variety of financial structures for the construction and long-term financing of projects. Most recently, the Applicant has had success in working with unregulated subsidiaries of large utilities, such as Duke Energy Renewables, Dominion, PSEG Solar Source and other similar entities that are most efficient owners of utility-scale solar projects, having both tax exposure to utilize the benefits of the Investment Tax Credit (ITC) and large balance sheets with which to finance projects.

The Project PPA is attached as **Appendix E- Power Purchase Agreement**, which evidences the Utilities attempting to meet the power needs of its local customer base. The PPA was executed between Colorado Springs Utilities, an enterprise of the City of Colorado Springs ("Utilities") and Pike Solar LLC ("Seller") on September 14, 2020. The PPA outlines the terms and conditions by which the Seller will sell and dispatch all energy generated by the Project to Utilities including a guaranteed energy generation requirement.

(4) Natural Hazards

The Project is not subject to significant risk from natural hazards. The determination of risk from natural hazards to the Project may include but is not limited to the following considerations:

- a) Faults and Fissures
- b) Unstable slopes including landslides, rockslides and avalanche areas
- c) Expansive or evaporative soils and risk of subsidence
- d) Wildfire hazard areas
- e) Floodplains

Information regarding the Geologic Conditions and Natural hazards are attached in the Geotechnical Engineering Report as **(Appendix T)** which also includes a map and laboratory test results associated with the soil conditions of the area. The report states that geologic hazards at the site are anticipated to be low. Seismic activity in the area is anticipated to be low and from a structural standpoint the property should be relatively stable.

The Project site is rural open space that does not have major faults, slopes or rockslide areas. Storm events and other natural hazards are considered in the civil design. The site will be designed to meet wind, snow-load, and other weather events, in accordance with El Paso County standards.

The Project site is located near a 100-year floodplain. The Applicant has submitted correspondence to the Pikes Peak Regional Building Department (PPRBD) with information regarding the design plan **(see Appendix O-PPRBD Correspondence)**. This plan evidences the Project's four planned road crossings that will traverse a 100-year floodplain. In the email dated January 20, 2021, Keith Curtis verifies that no issues exist with the Project plan, associated crossings, and floodplains. Therefore, the Applicant will be working to submit the permit applications for the Project's projected crossings according to the building department code.

For any emergency due to natural hazards, the Applicant is working with the Hanover Fire Protection District to ensure that a Fire Prevention and Protection Plan **(Appendix V)** and Emergency Response Plan **(Appendix W)** is in place for the Project. The Applicant has enlisted feedback from the Fire Chief to coordinate emergency route plans to the site and provide first response initiatives for Fire and EMS needs to the site location.

(5) Local Government Impact/Infrastructure

The Project will not have a significant adverse effect on the capability of local governments affected by the Project to provide local infrastructure and services or exceed the capacity of service delivery systems. The determination of the effects of the Project on local government services may include but is not limited to the following considerations:

- a) Current and projected capacity of roads, schools, infrastructure, drainage and/or stormwater infrastructure, housing, and other services necessary to accommodate development, and the impact of the Project upon the current and projected capacity
- b) Changes caused by the Project in the cost of providing education, transportation networks, water treatment and wastewater treatment, stormwater drainage, channel stabilization, bridges, emergency services or other governmental services or facilities
- c) Need for temporary roads to access the Project for construction and maintenance
- d) Change in demand for public transportation

The Project proposes two traffic routes for equipment and personnel. This can be found in the **Appendix AI-Haul Route Map**. Traffic for the construction will be managed through **Appendix AJ- Traffic Memo** which estimates a volume between 150-202 vehicle trips per day during construction. The construction team plans to work within the 7 a.m.- 7 p.m. timeframe Monday through Saturday and maintain speeds within the site at 11 mph. This are designed for conservation techniques as well as limiting impact on the community. In effort to maintain the quality of the roads for the community, the Applicant is also conducting a survey (**Appendix AK-Road Conditions Survey Work Plan**) to evaluate the roads' present conditions and plans to maintain the roads' conditions by providing compensation to offset the Applicant's proportional contribution to road damage. The goal of these plans is to provide the county and community an outlined plan to reduce the footprint and impact that this Project will have on infrastructure.

(6) Recreational Opportunities

The Project will not have a significant adverse effect on the quality or quantity of recreational opportunities and experience. The determination of effects of the Project on recreational opportunities and experience may include but is not limited to the following considerations:

- a) **Changes to existing and projected visitor days**
- b) **Changes in quality and quantity of fisheries**
- c) **Changes in instream flows or reservoir levels**
- d) **Changes in access to recreational resources**
- e) **Changes to quality and quantity of hiking, biking or horseback riding trails**
- f) **Changes to hunting experiences**
- g) **Changes to open space**
- h) **Changes to existing conservation easements**
- i) **Changes to regional or neighborhood parks**

The Applicant has worked to mitigate impact to open space, parks and trails by coordinating with the El Paso County Parks and Trails Department on design plans. In an effort to move forward with the Project and work with the potential future trails and Kane Ranch Open Space plan, an integrated design proposal was established in **Appendix AF- Parks and Trails Proposal**. In addition, a Visual Simulation (**Appendix AC**), which shows renderings of the Project area from various angles, details that the majority of the views within the area will not feature Project components and also verifies that no mountain scape views will be inhibited. Overall, the project will not inhibit any recreational opportunities or adversely affect any viewsheds.

(7) Air Quality

The Project will not significantly degrade air quality. The determination of effects of the Project on air quality may include but is not limited to the following considerations:

- a) **Changes in visibility and microclimates**
- b) **Applicable air quality standards**

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 Land Development Code 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 plans to submit an Air Pollutant Emissions Notice (APEN) prior to the start of construction, which will be submitted as-required to the Colorado Department of Public Health and Environment (CDPHE) for any project that disturbs or covers 25 or more contiguous acres of land or continues four or more months.

(8) Visual Quality

The Project will not significantly degrade existing visual quality. The determination of visual effects of the Project may include but is not limited to the following considerations:

- a) Visual changes to ground cover and vegetation, waterfalls and streams, or other natural features**
- b) Interference with viewsheds and scenic vistas**
- c) Changes in landscape character types of unique land formations**
- d) Compatibility of structure size and color with scenic vistas and view sheds**
- e) Changes to open space**
- f) Changes to existing conservation easements**
- g) Changes to impacts to regional or neighborhood parks**

During the construction phase of the Project, vegetation will be removed as necessary. When the Project becomes operational, reseeded efforts will then take place. In addition, the Integrated Noxious Weed Management Plan (**see Appendix X**) will be used to help prevent non-native vegetation from growing on the Project site.

The Project site is located in a rural area and the nearest homes are over 1 ½ miles from the site. The site is located strategically next to the pre-existing Williams Creek Substation in order to connect the system more efficiently. The Palmer solar site already exists near the site as well as other electrical infrastructure, a gas pipeline, and a landfill. We have included a Visual Simulation (**Appendix AC**) within the application to project how the Project will look from various vantage points. The Project does not affect any scenic views toward the west. The arrays will be visible from Birdsall Road located at site 4 in the simulation which is southwest of the site. The primary visual impact of the project will come from the ground-mounted solar arrays, which have a relatively low profile, conform to the existing terrain, and have minimal issues related to glare or reflection. The design of the project includes the construction of a single additional overhead line, adjacent for its entire length to existing or planned power infrastructure. The groups of modules will each be fenced off for safety purposes and help reduce the impact of greater visual footprint on the property.

Upon completion, the Project site will be unmanned, remain rural, and create minimal impacts to the lands. The Utilities has earmarked a Reservoir Expansion Area on the Project site. In addition, a potential trail outlined by the El Paso County Parks and Trails Department that would connect to the Kane Ranch Open Space is also noted for possible development. This potential trail been thoughtfully integrated into the Project design in effort to help the land remain rural and to benefit the public (**Appendix AF- Parks and Trails Proposal**). These trail and open space options remain intact for the benefit of the public.

(9) **Surface Water Quality**

The Project will not significantly degrade surface water quality. The determination of effects of the Project on surface water quality may include but is not limited to the following considerations:

- a) Changes to existing water quality, including patterns of water circulation, temperature, conditions of the substrate, extent and persistence of suspended particulates and clarity, odor, color or taste of water
- b) Applicable narrative and numeric water quality standards
- c) Changes in point and nonpoint source pollution loads
- d) Increase in erosion
- e) Changes in sediment loading to waterbodies
- f) Changes in stream channel or shoreline stability
- g) Changes in stormwater runoff flows
- h) Changes in trophic status or in eutrophication rates in lakes and reservoirs
- i) Changes in the capacity of functioning streams, lakes or reservoirs
- j) Changes to the topography, natural drainage patterns, soil morphology and productivity, soil erosion potential and floodplains
- j) Changes to stream sedimentation, geomorphology, and channel stability
- k) Changes to lake and reservoir bank stability and sedimentation and safety of existing reservoirs

Several steps have been taken to ensure no adverse effects on surface water.

The Non-Wetlands Features and Wetlands Report dated October 2, 2020 (see **Appendix H**) identifies possible wetland locations where the USACE may exercise Jurisdiction. The Report was submitted to the USACE (see **Appendix K**) and the response is that no jurisdictional wetlands or waters were found. The regional district office determination is subject to the USACE headquarters final approval. The final determination means there are no further actions required by the USACE. Therefore, the Project will not impact any of these water features on the site nor cause any changes to the water flows.

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. These crossings will be concrete pads that are certified as a less than one-foot crossing and ensure little impact to surface water.

The other drainage-related plans supplied for this Project include the Grading and Erosion Plan (see **Appendix P**) and the Drainage Report (see **Appendix S**), which will comply with the El Paso County Drainage Criteria Manual.

Additional plans and permits will be submitted following this application, including the Stormwater Management Plan (SWMP), which will follow the Best Management Practices (BMP) guidelines.

(10) Groundwater Quality

The Project will not significantly degrade groundwater quality. The determination of effects of the Project on groundwater quality may include but is not limited to the following considerations:

- a) Changes in aquifer recharge rates, groundwater levels and aquifer capacity including seepage losses through aquifer boundaries and at aquifer-stream interfaces**
- b) Changes in capacity and function of wells within the impact area**
- c) Changes in quality of well water within the impact area**

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 is developing plans and identifying methods for appropriate drainage and flood protection.

Testing for groundwater was conducted through the **Geotechnical Engineering Report (Appendix T)**. Although groundwater levels can be expected to fluctuate with varying seasons and weather conditions, groundwater findings were minimal in the boring and test pit logs. There were 60 exploratory borings and 24 test pits conducted on the Project site. There was groundwater found in only one test pit at about 7 feet below existing site grade while excavating. This project is limited to surface impact and will not have measurable impacts to groundwater quality.

(11) Wetlands and Wildlife

The Project will not significantly degrade wetlands and riparian areas, terrestrial or aquatic plant or animal life. The determination of effects of the Project on these areas shall include the considerations raised in the applicable federal and/or state Permits.

The layout of the Project has been thoughtfully prepared around wetland and wildlife factors. Several studies were conducted on the Project area, specifically, the **Appendix F- Biological Resources Report** dated November 2, 2020 and the **Appendix G- Phase I Environmental Site Assessment** dated October 21, 2020. Additionally, the **Appendix H- Non-Wetland Water Features and Wetlands Report** dated October 2, 2020 was rendered and submitted to state and federal agencies for review.

The Project will not significantly degrade any wetland or riparian areas. Supporting evidence for this can be found in **Appendix K- USACE Correspondence**. On October 2, 2020, correspondence was sent to the US Army Corps of Engineers (USACE) regarding Jurisdictional Approval for the wetland report. The final determination is included indicating that no jurisdictional wetlands or waters were found. The Project design works around many of the identified features in **Appendix H** and the USACE preliminary response indicates no jurisdiction on those identified waters, meaning no larger scale impact to the water features that USACE manages. No further action is required regarding these waters from the USACE.

In addition, the Project will not significantly degrade animal life either. Colorado Ecological Services of the US Fish and Wildlife Service (USFWS) received our letter on November 10, 2020 and submitted their correspondence on December 7, 2020 expressing no concerns about the Project's impacts to species (**Appendix I- USFWS Correspondence**). Additionally, the Applicant submitted a letter to the Colorado Parks and Wildlife (CPW) department on November 10, 2020. CPW responded on February 1, 2021 with general concurrence to all the biological report recommendations for wildlife and associated habitats. The Applicant has agreed to abide by the recommendations made by CPW. **Appendix J- CPW Correspondence** contains communications and recommendations for mitigation of wildlife impacts.

(12) Soils and Geologic Conditions

The Project will not significantly deteriorate soils and geologic conditions. The determination of effects of the Project on soils and geologic conditions may include but is not limited to the following considerations:

- a) Loss of topsoil due to wind or water forces**
- b) Changes in soil erodibility**
- c) Physical or chemical soil deterioration**
- d) Terrain deformation/mass wasting/subsidence**
- e) Compacting, sealing and crusting**
- f) Waterlogging**
- g) Soil morphology and productivity**

The Project will not significantly deteriorate soil or geologic conditions in the area. Civil designs have been rendered to ensure drainage, grading and erosion are planned to avoid adverse effects. Several reports have been rendered to develop a civil design that maintains the integrity of the project and takes into account proper drainage and grading to prevent erosion. The Drainage Report (**Appendix S**) provides recommendations for site drainage and any changes that may need to be implemented to accommodate for the site design and maintain the integrity of the surface flows. The Grading and Erosion Plan (**Appendix P**) is the Applicant's civil design to help properly grade the site location to prevent erosion. Lastly, the Geotechnical Engineering Report (**Appendix T**) states that grades will be adjusted to provide positive drainage away from the structures. Infiltration of water into the utility or foundation excavations must be prevented during construction.

(13) Nuisance

The Project will not cause nuisance. The determination of nuisance effects of the Project may include but is not limited to the following considerations: increase in odors, dust, fumes, glare, heat, noise, vibration, or artificial light.

When the project becomes operational, the site is an unmanned solar facility that has a negligible impact on any nuisance. There will be minimal dust or fumes resulting from periodic site visits from operations and maintenance personnel. The noise caused by a solar facility will be equivalent to an air conditioning unit and the glare from solar panels will be minimal. The site is not located near any homes or near the roads to affect the local community.

During the construction phase, the Applicant will work to minimize noise, dust, fumes and other nuisances caused by project development. The Applicant will abide by 6.2.7 guidelines for Operational Standards in the Land Development Code. Construction activities will be limited to the times between 7 a.m. and 7 p.m. Monday through Saturday and will not exceed the maximum dBA permitted in the code. The dust mitigation efforts will be performed by spraying water onsite during the construction to prevent dust emission in the air.

Correspondence with the Federal Aviation Administration (FAA) dated October 13, 2020 is attached as **Appendix L- FAA Correspondence**, confirming a "No Hazard Determination" for the Project. The Project will not interfere in any aviation activities in the area.

Appendix AD- Lighting Plan provides an outline for how artificial lighting will be used on the Project during time of construction and once the Project becomes operational. The plan notes that lighting will be used on an ‘as needed’ basis. Construction is limited to daylight hours so artificial lighting will be extremely limited. In addition, lighting will only be used for motion sensing near the equipment once the Project is operational. Limiting our lighting efforts is another conservation technique in place for the Applicant.

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.

(14) Hazardous Materials

The Project will not result in unreasonable risk of releases of hazardous materials. The determination of the risk of release of hazardous materials caused by Project may include but is not limited to the following considerations:

- a) Plans for compliance with federal and state handling, storage, disposal, and transportation requirements**
- b) Use of waste minimization techniques**
- c) Adequacy of spill prevention and response plans**

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.

The lithium contained in the BESS installed on the property will be considered a hazardous material. Several plans will exist ensuring that regulations are followed, and appropriate measures are taken to minimize impacts from the installation, operation, and decommissioning of said BESS. The BESS will be housed in a containerized unit, surrounded by security fencing, and the unit will undergo UL9540A testing. The plan for handling the battery will be agreed upon with the Hanover Fire Protection District. Should there be any emergency associated with the Project, a guide on handling the battery is outlined in the **Appendix W- Emergency Response Plan**.

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 BESS 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.

(15) Effect on Urban Development/Population

Urban development, population densities, and site layout and design of the storm water and sanitation systems shall be accomplished in a manner that will prevent the pollution of aquifer recharge areas. The determination of potential for pollution of the aquifer recharge areas by the Project may include but is not limited to the following considerations:

- a) Proximity of urban development and population densities to aquifer recharge areas
- b) Proximity of stormwater and sanitation systems to aquifer recharge areas
- c) Changes in water quality in the aquifer recharge areas

The Project is located in rural grazeland located away from most residential areas.

The Project is not anticipated to effect groundwater; therefore, aquifer recharge rates were not tested. Aquifers will not be used for water storage for this Project. The Project is located above-ground and not anticipated to have any measurable effect on groundwater.

(16) Community Development Demands

The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project, or to comply with regulatory or technological requirements. The determination of whether the Project is reasonably necessary may include but is not limited to the following considerations:

- a) Relationship to reasonable growth projections and local land use plans
- b) Relationship to other providers' service areas
- c) Whether the Project is not in compliance with regulatory or technological requirements or will not be in compliance in the near future

According to the U.S. Census Bureau El Paso County experienced a 15% growth rate between 2010 and 2019. Projections estimate continuous county growth and needs for energy to satisfy such growth.

Continuous growth within the community as well as increasing demand from the Utility has contributed to the Project plan. **Appendix AG- Colorado Springs Utilities Service Territories Map** is attached to illustrate the area that the Project will provide energy to.

The Applicant has worked to develop a plan within the policies of the Small Area Plans and County Policy Plans. The Application illustrates the regulatory compliance both through the county and on state and federal levels. The Project is in compliance with technical requirements including the county Engineering Criteria Manual and the Drainage Codes and Manual.

The need for this Project is based upon the Utility plans, state and federal renewable initiatives and local renewable goals. Utilities' developed a Sustainable Energy Plan through their Energy Vision. Within this plan, the Utilities 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. Support for increasing renewable energy is illustrated in community interest and local programs developed by groups, such as the Pike Peak Area of Council Governments. This local council authored a document titled, “Looking to Our Future- Pikes Peak Region 2030,” which described goals toward increasing renewable energy.