



Responses to comments made on the EDARP System

- Pikes Peak Regional Building Department
  - o Comment noted and the additional address has been requested
- City of Fountain
  - o Applicant met with City of Fountain on March 5, 2019 and came up with Haul Route approach (uploaded into EDARP system)
- Ensure wetlands, trails, and other elements shown on the 1041 are shown on the SDP sheets
  - o All elements on the approved 1041 map are shown on the SDP sheets (drainage, trails, etc.)
- Please include the proposed haul route from the 1041
  - o Included
- A fence or wall over 7' may require a permit from PPRBD
  - o Noted
- Ensure layout changes on that plan that impact other plans are included in the review cycle

Responses to comments made in the El Paso County Engineer Department letter (see Kimley Horn document for responses to majority of engineering related items)

- If the sediment basins do not have an outlet, a deviation request needs to be approved.
  - o No deviation is requested.
- Verify earthwork cut quantities in the SWMP are correct. Haul Route may be required.
  - o Preference for cut fill generated from construction activities is to place on site (either scattered or enhancing control measures). Any additional cut will be taken to the City of Fountain landfill (owned by Waste Connection). The landfill is located just 2.75 miles to the north of the site on the same road used to access the east side of the project.
- Has Lower Fountain Sewer District been contact regarding construction plans for Birdsall Road?
  - o Applicant spoke with Jim Heckman of Lower Fountain on 12/27/18 regarding the Palmer Solar Project. Jim did not have any concerns or issues with the Project and construction actions. As an adjacent property, Lower Fountain Sewer District had the opportunity to provide comment at the WSEO and 1041 stage on project components, including improvements to the public right of way. The access point for the Birdsall Road site is east of the access to the Sewage Facility and will not disrupt access, deliveries, or operations.

Additional Changes since 1041

- MET Station #2 has been moved from the central portion of the Squirrel Creek site to directly north of the Palmer Solar Project. Its location abides by setbacks and height restrictions placed on the project by the WSEO and 1041.
- 1041 map shows two minor access nodes above the Williams Creek Substation – those have been removed
- Size of substation and Solar Project are the same as proposed and approved in WSEO and 1041



March 9, 2019

Jeff Rice  
El Paso County  
3275 Akers Drive  
Colorado Springs, CO 80922

**RE:    *PPR-19-006 Palmer-Williams Solar Facility First Submittal***

Dear Mr. Rice:

Thank you for the comments dated March 4, 2019 for the above-mentioned project. In an effort to address your comments concisely and simplify your review process, we have summarized your comments and our responses below.

## **Engineering Division**

### **GENERAL COMMENTS:**

1. Note: A Conceptual Drainage Report and a Traffic Impact Study have been accepted for this site during the review of the Palmer-Williams Creek Wind and Solar Energy Overlay (WSEO-18-001) Application. The geotechnical report prepared by Terracon provides adequate subsurface drainage analysis.  
*Response: Acknowledged, thank you.*

### **SITE DEVELOPMENT PLAN**

1. See redlines.  
*Response: Redline comments have been addressed. Specific responses to these comments are documented below.*
2. Any areas where panels have been removed or added as compared to the 1041 plan approval need to be specifically addressed.  
*Response: The location and shape of the panel array on the Squirrel Creek Site were optimized for construction of civil features and to fit the shape of the WSEO boundary. Reconfiguration reduced the number of rows on the Squirrel Creek site by 150. Configuration complies with zoning and 1041.*

### **DRAWING 1**

1. Change Development Services Department to "PCD"  
*Response: This has been updated.*
2. Change "DOT" to "DPW"  
*Response: This has been updated.*
3. Add PCD File # PPR-19-006 to each sheet.  
*Response: This has been added.*

### **DRAWING 2**

1. This easement is called out on the 1041 as variable width.  
*Response: This label has been updated to "variable width".*

## DRAWING 5

1. Make sure these match the GEC Plan

*Response: The permanent west berms have been updated to match the GEC.*

## DRAWING 9

1. Is this label in incorrect location or is watercourse layer turned off here?

*Response: Label is correct, watercourse linework has been adjusted to correct location.*

## DRAWING 10

1. Over here?

*Response: The property label has been moved accordingly.*

## DRAWING 11

1. Is this in the correct location.

*Response: The linework has been adjusted to the correct location.*

## DRAWING 12

1. Is this label incorrectly placed?

*Response: This label has been moved to the correct location.*

## DRAWING 13

1. Substation appears larger than depicted on the 1041 drawing. Please detail revisions so we can verify the proposed scope was authorized in the 1041 permit.

*Response: The substation linework has been updated. No modifications to scope (size or capacity) for the Williams Creek Substation have been made relative to the 1041 permit.*

## DRAWING 14

1. Are these sheds as well?

*Response: These are construction trailers and have been labeled as such.*

## DRAWING 17

1. Solar panels removed in this area from what shown on the 1041.

*Response: The location and shape of the panel array on the Squirrel Creek Site were optimized for construction of civil features and to fit the shape of the WSEO boundary. Reconfiguration reduced the number of rows on the Squirrel Creek site by 150. Configuration complies with zoning and 1041.*

## DRAWING 19

1. This section of solar panels did not show up on the 1041 permit. It appears panels were removed from another area. Please confirm that this layout revision balances out the panels that were removed and does not increase the overall number of panels or the wattage of the project.

*Response: The location and shape of the panel array on the Squirrel Creek Site were optimized for construction of civil features and to fit the shape of the WSEO boundary. Reconfiguration reduced the number of rows on the Squirrel Creek site by 150. Configuration complies with zoning and 1041.*

**DRAWING 22**

1. Begin construction.  
*Response: This note has been added.*
2. Label  
*Response: The existing road has been labeled.*
3. Show fence relocation and swale flowline.  
*Response: The swale flowline location has been added to the plan. The existing fence along Birdsall is to remain except where the proposed solar access will be located. The proposed fence location is shown and the removal of the existing fences across the access is called out on the plan.*
4. Show new cattle gate location outside ROW.  
*Response: Proposed cattle gate location is now shown.*
5. End Construction  
*Response: This note has been added.*
6. Label north-south  
*Response: This note has been added.*
7. Gravel surface course per ECM Section D.5.6 and Table D-7.  
*Response: This label has been added.*

**DRAWING 23**

1. Project number PPR-19-006  
*Response: This note has been added.*

**TRAFFIC / TRANSPORTATION**

1. Note: A traffic impact study, a haul route exhibit and a road condition survey were submitted with the 1041/AASI application and were found to adequately address the project's anticipated impacts on local transportation facilities. A post-construction road condition survey will be required to determine if the project caused any impacts to County roads requiring repair.  
*Response: Acknowledged, thank you.*
2. See City of Fountain comments dated February 28, 2019. Provide documentation verifying any agreements with the City.  
*Response: A separate response for this comment is provided by Juwi Solar in an additional letter.*

**FINAL DRAINAGE REPORT**

1. Ensure that any layers shown on the drainage plans (such as temporary sediment basin outlets) are labeled or removed if associated only with temporary BMPs.  
*Response: Temporary BMPs have been removed from the drainage plans. Updated plans are now included in the drainage report.*
2. Ensure that the Opinion of Probable Construction Cost in the FDR includes all public and private drainage improvements or just reference the FAE.  
*Response: The OPCC has been removed and the FAE has been provided for reference.*
3. Address in the Letter of Intent any permanent sediment basins identified on the WSEO plan that are being replaced with other permanent BMPs.

*Response: The letter of intent has been updated accordingly.*

4. Provide engineer's stamp and signature and owner/developer signature.

*Response: Engineer's stamp/signature and owner/developer signature have been added.*

## **GRADING EROSION CONTROL/STORMWATER MANAGEMENT PLAN**

1. See GEC and SWMP redlines.

*Response: These comments have been resolved. Specific responses are listed above in the body of this letter.*

1. Ensure that all checklist items (attached) have been provided; items missing or needing additional information are highlighted in blue and yellow. For any unknown/undecided items, add a note to the GEC Plan stating how they will be addressed.

*Response: Acknowledged. A separate narrative of missing/needing additional information checklist items is provided further below for clarity.*

2. If the sediment basins do not have an outlet, a deviation request needs to be approved. If a deviation is requested, it should include the requirement that the sediment basins would be emptied within 40 hours after the rainfall (note #3 on Figure SB-1 and UDFCD page SB-5).

*Response: PVC riser pipes with outfalls have been added to all temporary sediment basins that were previously "non-draining". Therefore, a deviation request is not being pursued as the temporary sediment basins now comply with the Criteria.*

3. As noted in 1041/AASI comments on 1/31/19, it appears that swale elevations and check dams can be further fine-tuned to release runoff in historic flow patterns, through the use of level spreaders, contour berms or similar methods to minimize concentration of flows along the project boundary. The plans have been clarified; however, additional field adjustments to minimize point discharges and their effects, specifically on the west project boundary, need to be provided as practicable. The selected contractor should be made aware of this.

*Response: Acknowledged. A note has been added to the plans stating that the contractor should be aware of that additional field adjustments of the west berms and level spreaders at point discharges will be required throughout construction.*

4. Verify that the earthwork cut quantities in the SWMP appendix are correct. If this material is all being exported a haul route plan may be required, and the City of Fountain may have additional requirements.

*Response: Earthwork quantities have been updated. There is still an anticipated excess in material. This material will either be spread on-site within the limits of proposed grading/disturbance or hauled to the Waste Connections Landfill. If material is hauled off-site it has been noted on the plans and in the report that a haul route plan will be required. It is further anticipated that the haul route to the landfill will be on private roads owned/operated by either CSU or Waste Connections and will not impact the City of Fountain.*

## **GEC Plans**

## **DESIGN CHANGES**

A minimal amount of design changes has been made to the GEC plans based upon on-going coordination with Juwi Solar and El Paso County. A brief description of changes is listed below for reference.

- Temporary Sediment Basins have been resized in areas where limited disturbed area is tributary to said basin.
- Profile and grading of drainage channel on Squirrel Creek site has been lowered to facilitate overland flow towards channel.
- Limits of construction have been revised slightly
- Silt fence and perimeter control BMPs have been adjusted with the LOC
- Temporary soil stockpile locations have been adjusted to be outside of SSA
- Channel outfall has been revised to reduce the quantity of check dams

## DRAWING 200

1. Change “DSD” to “PCD” in note no. 5.  
*Response: This has been revised.*
2. Update El Paso County Engineering contact information to “2880 International Circle 80910”  
*Response: This has been revised.*
3. Add “PPR-19-006” to bottom right hand corner of plans.  
*Response: This has been added to all sheets.*

## DRAWING 205

5. If the sediment basins do not have an outlet, a deviation request needs to be approved. If a deviation is requested, it should include the requirement that the sediment basins would be emptied within 40 hours after the rainfall (note #3 on Figure SB-1 and UDFCD page SB-5).  
*Response: PVC riser pipes with outfalls have been added to all temporary sediment basins that were previously “non-draining”. Therefore, a deviation request is not being pursued as the temporary sediment basins now comply with the Criteria.*

## DRAWING 212

1. Label berm.  
*Response: This berm has been removed from the plan as it is not needed to direct flows. Flows will maintain historical path, north of access road.*

## DRAWING 212

1. Turn this layer off or adjust the location and label it.  
*Response: This layer has been turned off on the GEC plans. The location of this linework has been adjusted to reflect its correct position and will be labeled accordingly on the SDP plans.*

## DRAWING 219

1. Have these panels been deleted?

*Response: The location and shape of the panel array on the Squirrel Creek Site were optimized for construction of civil features and to fit the shape of the WSEO boundary. Reconfiguration reduced the number of rows on the Squirrel Creek site by 150. Configuration complies with zoning and 1041.*

## **SWMP Report**

### **PAGE 3**

1. Include GEC Plan w/final/field version.

*Response: GEC plans have been added to the appendix.*

### **PAGE 4**

1. Provide Signature

*Response: Owner signature has been added.*

### **PAGE 5**

1. Provide Signature

*Response: Engineer signature has been added.*

### **PAGE 7**

1. Provide Signatures

*Response: Owner signature has been added. Operator and subcontractor certifications will be added when the contractor is selected, prior to commencement of construction.*

### **PAGE 11**

1. Describe soil erosion potential and potential impacts upon discharge.

*Response: This information has been added to the narrative.*

### **PAGE 14**

1. Note 13 – Generally describe (fencing, etc.?)

*Response: This information has been added to the narrative.*

2. Note 8 – Insert “reseeding”

*Response: This has been added.*

## **EARTHWORK CALCULATIONS**

1. Where is the material being moved to? Notify contractor that a haul route plan and agreement should be assumed to be required.

*Response: The proposed grading for the project has been revised since last issuance. This table has been updated accordingly. Excess material generated through earthwork operations will either be spread on-site within the limits of the grading/disturbed areas shown on the GEC plans OR be hauled off-site to the Waste Connections Landfill. A note has been added to the report and plans stating that “A Haul Route Plan and agreement with Waste Connections will be required prior to material leaving the site and being delivered to the Waste Connections Landfill”.*



## OTHER FORMS / FINANCIAL ASSURANCES ESTIMATE / ESQCP

1. See Letter of Intent redlines.  
*Response: A separate response for letter for the Letter of Intent is provided by Juwi Solar.*
2. FAE:
  - a. The FAE does not need to include the Section 3 items.  
*Response: Section 3 items have been left in for reference but are not included in the total sum calculation at the end of the FAE.*
  - b. The earthwork cost may be reduced to a unit price of \$2.19. (This is based on a sliding scale that will be utilized on the upcoming FAE update.)  
*Response: This unit price has been updated.*
  - c. Add concrete washout area(s) to the FAE.  
*Response: This has been added.*
  - d. Add a cost in the line for as-built plans (Birdsall Road improvements).  
*Response: This has been added.*
3. Has Lower Fountain Metro District been contacted regarding the construction plans for Birdsall Road? Please verify and provide correspondence that improvements will not affect their utilities.  
*Response: Yes, Juwi has contacted LFMD.*

## EL PASO COUNTY GRADING AND EROSION CONTROL PLAN SUBMITTAL CHECKLIST

### Items Marked "Provided, needs minor clarification/correction"

1. All existing and proposed easements (permanent and construction), including required off site easements.  
*Response: Existing easements are shown on plans. Proposed easements (permanent and construction) are not anticipated with the Project and therefore not shown.*
2. Any offsite grading clearly shown and called out.  
*Response: Offsite grading is limited to the Birdsall Road improvements at the southwest corner of the Project.*

## STORMWATER MANAGEMENT PLAN CHECKLIST

### Items Marked "Provided, needs minor clarification/correction"

1. Phasing plan – may require separate drawings indicating initial, interim, and final site phases for larger projects. Provide "living maps" that can be revised in the field as conditions dictate.  
*Response: A separate table/list has been provided in the narrative describing which BMPs are to be provided in the initial phase and which are in the final phase. Separate drawings for interim and final are not being provided. Full-size copies of the GEC plans will be kept on-site at all time and will be the "living maps" which will be updates as field conditions dictate as required by El Paso County and the State of Colorado.*
2. SWMP Map to include areas of cut and fill  
*Response: Areas of cut/fill have been added to the plans.*



3. Record keeping procedures identified to include signature on inspection logs and location of SWMP records onsite.

*Response: This information has been added to the narrative under the "Stormwater Management Controls – SWMP Administrator" section.*

**Items Marked "Not found/missing information"**

1. Soil erosion potential and potential impacts upon discharge.  
*Response: This information has been added to the narrative.*
2. The name of ultimate receiving waters; size, type and location of stormwater outfall or storm sewer system discharge.

*Response: This information has been added to the narrative.*

3. Narrative description of all structural BMPs to be used, including: silt fence, straw bales, check dams, sediment basins, diversion swales, etc. Ensure that methods are ECM/DCM-approved.

*Response: This information has been added to the narrative under section "Erosion & Sediment Control Measures".*

4. Technical drawing details for BMP installation and maintenance.

*Response: This information has been added to the appendix of the SWMP report.*

Please contact me at (719) 453-0180 or [eric.gunderson@kimley-horn.com](mailto:eric.gunderson@kimley-horn.com) should you have any questions.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



Eric Gunderson P.E.  
Project Manager