



# COLORADO

## Parks and Wildlife

Department of Natural Resources

Southeast Region, Area 14  
4255 Sinton Road  
Colorado Springs, CO 80907 P  
719.227.5200 | F 719.227.5223

November 15, 2017

El Paso County Planning and Community Development Department  
ATTN: Kari Parsons, Project Manager  
2880 International Circle,  
Colorado Springs, CO 80132

Re: Environmental Review for Proposed Front Range-Midway Solar Project for El Paso County, CO, File WSEO-17-001

To: Kari Parsons

Colorado Parks and Wildlife (CPW) has received and appreciates the request for comments on the proposed WSEO - Wind and/or Solar Energy Generation Plan Overlay for the Front Range-Midway Solar Project in El Paso County, Colorado. CPW has a statutory responsibility to manage all wildlife species in Colorado; as such we encourage protection for Colorado's wildlife species and habitats through responsible energy development and land use planning. Protection of core wildlife areas, quality fisheries and habitat, big game winter range and seasonal migration corridors, and raptor nesting locations are of extreme importance. CPW recommends that all proposed projects be assessed to avoid, minimize, or mitigate impacts to sensitive wildlife habitats and species. That includes species of concern as well as Federal and/or State listed species, big game wildlife (migration corridors, winter range, parturition areas), breeding and nesting habitats for sensitive ground-nesting birds, and nests of raptors sensitive to development in order to prevent loss of habitat or fragmentation of habitat.

CPW staff is familiar with the proposed location of the project as well as the area surrounding the site. In 2014 CPW visited the proposed location and prepared a list of potential impacts to local wildlife and provided the developer with recommendations to avoid, minimize, and mitigate those impacts. That 2014 letter from CPW was submitted with this application, along with a Critical Issues Analysis report from Tradewinds Energy based on a desktop review, and the Wetlands, Waterbodies, and Threatened, Endangered, and Species of Special Concern Survey Report report based on a one day site visit by a consultant. Many of those findings were consistent with



CPW's observations of the site. Unfortunately there are no additional details or planning documents submitted that provide information on how the site will be developed or the proposed construction practices. CPW would also like information on how the developer plans to address the concerns raised previously by CPW or the findings in reports submitted by the consultants included in this current project application. For a project of this scope with impacts to both habitat and wildlife CPW would recommend the developer commit to pre-construction surveys and best management practices that would minimize the impacts of this project as well as a noxious weed management program and a reclamation plan.

For eligible energy resources, new renewable energy projects should follow Colorado PUC Rule 3668 on Environmental Impacts in conducting wildlife surveys, in using these surveys to avoid, minimize and mitigate potential impacts to wildlife and their habitats, and work closely with CPW in the design of their project. In selecting sites for construction, CPW recommends that developers focus on options that avoid critical wildlife habitats over the use of mitigation strategies. Areas that exhibit high levels of wildlife use within this project area or are unique or critical habitat to wildlife would benefit greatly by not placing facility infrastructure, including transmission lines, adjacent to or over such areas. If all options for avoiding impacts are taken and prove insufficient, then minimization and mitigation strategies should be identified and implemented.

**Habitat loss and fragmentation:** In general, CPW recommends that the developer consolidate facilities and roads to the extent possible, to minimize the amount of land that is disturbed and fragmented. Habitat loss and fragmentation are significant concerns regarding solar development and minimizing the project footprint can help reduce the impacts to wildlife. Riparian and wetland areas are important habitats for a variety of wildlife and need to be connected as much as possible so a layout that maintains access for wildlife to those areas in particular is preferred. Wildlife species that can potentially be found on the Project site are: black tailed prairie dog, bobcat, cottontail rabbit, coyote, mule deer, white-tailed deer, elk, pronghorn, red fox, jack rabbit, mountain lion, skunks, variety of small burrowing rodents, a variety of reptiles which include snakes and lizards, and a variety of grassland birds, Golden eagle, Ferruginous hawk, Red-tailed hawk, Prairie falcon, and Swainson's hawk likely hunt nearby and within the prairie dog colony and nest in the surrounding area. An annually active known Golden eagle nest is located within a 5-mile radius of the project. CPW recommends that the habitat with water on the Project area remain undisturbed and contiguous with undeveloped land around it. This provides possible habitat for the northern leopard frog, as well as a water source for all wildlife and possibly used by Townsend's big eared bats as foraging grounds. CPW would be happy

to work with Front Range-Midway Solar LLC and their consultants to help identify potential layouts within the proposed footprint that would avoid or minimize potential impacts to these species.

**Noxious weed management:** Also of importance are revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas and control of invasive weed species are important components of the project and it is critically important that the site be restored back to the native plant community that currently exists on site. It would be very important that any disturbed soil in this area be replanted in native grasses as soon as possible to minimize loss of top soil and the introduction of invasive noxious weeds. CPW prefers that native vegetation be retained on site during the operational lifespan of the project, both as habitat for wildlife and to ensure successful reclamation of the project area. Proper reclamation, from a wildlife perspective, involves not only stabilizing the soil and establishing ground cover, but fostering plant communities with a diversity of species and plant types -grasses, woody plants, and broadleaf forbs- which will fully serve the nutritional needs of wildlife. Strict adherence to the Natural Resources Conservation Service's recommendations is advised. CPW would appreciate the opportunity to review the project's Noxious Weed Management Plan prior to the start of construction.

**Fencing:** CPW is aware that the solar project area will likely include security fencing. We have attached our recommendation for "Fencing with Wildlife in Mind" for your consideration and review. We will be happy to discuss any questions you have about fencing of the project when plans are available. For any installed fencing CPW recommend a smooth top to the fence (e.g., no top barbed wire or exposed metal rods) to prevent wildlife from impaling themselves. If wildlife exclusion fencing is installed CPW would request that the solar facility is checked regularly or structures are installed to allow animals to escape, in the unlikely event that a deer or other wildlife become trapped in the facility.

**Transmission lines:** Given the project site's proximity to a substation, and the statements of the developer that minimal new lines will be built, it is unlikely that new transmission lines would be significant contributor to the wildlife and habitat impacts of this project. If new transmission lines do become part of the development plan CPW preference is for new transmission lines to follow existing transmission line or infrastructure corridors whenever possible to minimize additional impacts on wildlife and habitat fragmentation.

Of high concern regarding electrical transmission lines is the potential for raptor electrocution. Through the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, the U.S. Fish and Wildlife Service, in cooperation with the Edison Electric Institute, has developed Best Management Practices to minimize impacts to avian species. CPW recommends that both the “Suggested Practices for Avian Protection on Power Lines, the State of the Art in 2006” and the “Reducing Avian Collisions with Power Lines: The State of the Art in 2012” documents be consulted for proper design considerations to minimize raptor electrocution. These documents can be ordered at the Edison Electric Institute website ([www.eei.org](http://www.eei.org)) or can be downloaded at the Avian Power Line Interaction Committee website ([www.aplic.org](http://www.aplic.org)). This recommendation is applicable to all segments included in the project.

**Migratory birds:** Consultation with USFWS is recommended to ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Act. The best way to avoid impacts on the nesting efforts of migratory birds is to focus construction activities outside of the breeding season (March 15<sup>th</sup> -October 31<sup>st</sup>). If construction must occur during the breeding season, surveys for active nests should be conducted prior to groundbreaking. All migratory birds are protected under the Migratory Bird Treaty Act and removal or disturbance of any migratory bird nest would require consultation with CPW and USFWS prior to disturbance.

**Raptors:** There is suitable habitat on the site for nesting raptors. CPW recommends the use of preconstruction surveys, as well as continuation of those surveys during construction, to identify all raptor nests within the project area and implement appropriate restrictions. CPW recommends adherence to the recommended buffer distances and timing stipulations identified in the attached document “Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors”. Removal or relocation of any active raptor nest will require consultation with CPW and US Fish and Wildlife Service prior to disturbance. Both active and potential raptor nest sites, as well as winter night roosts should be considered when evaluating disturbance during construction. These recommendations apply to both the solar field and transmission line construction areas.

#### **State Threatened Species and State Species of Concern**

Burrowing owl, black tailed prairie dogs, swift fox, mountain plover, Townsend’s Big Eared bat and the Northern Leopard Frog are likely to be present on site. While none of these species are federally listed, the burrowing owl is State Threatened and the swift fox, mountain plover, and the Townsend’s big eared bat are State Species of Concern. Due to the status of these species, it is recommended that special precautions be taken to avoid adverse impacts to individuals in the project area.

**Burrowing Owls:** If any prairie dog colonies are located within the project area CPW recommends surveys to determine the presence/absence of *burrowing owls (Athene cunicularia)*, a state threatened bird. If development or construction in prairie dog towns occurs from February 1 to October 31, the presence of burrowing owls and whether they are actively nesting should be determined. If nesting burrowing owls are present, no human encroachment should occur within 150 ft of nesting burrows from March 15 to October 31. If burrowing owls merely occupy the site, it is recommended that earthmoving and other disturbance activities be delayed until late fall after they have migrated. Attached is CPW's protocol for surveys (Recommended Survey Protocol and Actions to Protect Nesting Burrowing Owls).

**Mountain Plover:** Portions of the proposed project area are in range of the Mountain Plover (*Charadrius montanus*), a state species of special concern. The Best Management Practices for mountain plover recommend surveys to identify habitat and plover nests within the project area, and plan construction activity outside of critical nesting periods, April 1st through August 15 where these species are found. Mountain plovers can nest in short-grass prairie, dryland cultivated farms, and prairie dog towns and are likely to be nesting on the project area.

**Swift fox:** CPW recommends pre-construction surveys to identify and avoid all maternal swift fox den sites. Swift fox live here year-round, breed during December, and raise their young into the next fall. It is recommended that swift fox surveys include daylight searches for den areas and nighttime spotlight searches during August and September. Swift fox is a species of state and federal concern that lives in and around the proposed area.

**Townsend's Big Eared Bat:** A colony of is located within a 5 mile radius of the Project area. The bats may frequent the small water hole in the Project area to drink and hunt insects. The survey report from 2015 states the stock pond would remain with development of the project and would continue to provide potential foraging opportunities and a water source for drinking but that is not confirmed in any of the other project documents.

CPW may have additional recommendations when the final layout and development plans are available for the proposed solar facility. In addition to the habitat specific impacts there are technology-specific factors associated with avian fatality risk at solar facilities and the final site plans could influence the potential risk for birds at the location. Any surface water or evaporation ponds associated with the project could increase the risk to wildlife on the installation either due to toxicity issues or by

acting as an attractant to higher risk areas. In locations with a potential risk to avian species CPW recommends development of a post-construction monitoring program in accordance with the USGS 2016 report Mortality Monitoring Design for Utility-Scale Solar Power Facilities.

CPW appreciates this opportunity to review the proposed Front Range-Midway Solar Project and we look forward to reviewing any other plans (i.e. reclamation plans, building and site plans) or biological surveys or assessments that are developed as the project nears implementation. If you have further questions please contact District Wildlife Manager Cody Wigner at (719) 227-5287 or via email at [cody.wigner@state.co.us](mailto:cody.wigner@state.co.us).

Sincerely,



Frank McGee  
Area Wildlife Manager  
4255 Sinton Rd.  
Colorado Springs, CO 80907

Cc: Cody Wigner, District Wildlife Manager  
Karen Voltura, SE Regional Energy Liaison



## RECOMMENDED SURVEY PROTOCOL AND ACTIONS TO PROTECT NESTING BURROWING OWLS

Western Burrowing Owls (*Athene cunicularia hypugaea*) are commonly found in prairie dog towns throughout Colorado. Burrowing owls require prairie dog or other suitable burrows (e.g. badger) for nesting and roosting. Burrowing owls are migratory, breeding throughout the western United States, southern Canada, and northern Mexico and wintering in the southern United States and throughout Mexico.

Federal and state laws prohibit the harming or killing of burrowing owls and the destruction of active nests. It is quite possible to inadvertently kill burrowing owls during prairie dog poisoning projects, removal of prairie dogs, destruction of burrows and prairie dogs using a concussive device, or during earth moving for construction. Because burrowing owls often hide in burrows when alarmed, it is not practical to haze the birds away from prairie dog towns prior to prairie dog poisoning/removal, burrow destruction, or construction activity. Because of this, the Colorado Division of Wildlife recommends surveying prairie dog towns for burrowing owl presence before potentially harmful activities are initiated.

The following guidelines are intended as advice on how to determine if burrowing owls are present in a prairie dog town, and what to do if burrowing owls are detected. These guidelines do not guarantee that burrowing owls will be detected if they are present. However, adherence to these guidelines will greatly increase the likelihood of detection.

### **Seasonal Timing**

Burrowing owls typically arrive on breeding grounds in Colorado in late March or early April, with nesting beginning a few weeks later. Active nesting and fledging has been recorded and may be expected from late March through early August. Adults and young may remain at prairie dog towns until migrating to wintering grounds in late summer or early autumn.

Surveys should be conducted during times when burrowing owls may be present on prairie dog towns. Surveys should be conducted for any activities occurring between March 15<sup>th</sup> and October 31<sup>st</sup>. No burrowing owls are expected to be present between November 1<sup>st</sup> and March 14<sup>th</sup>.

### **Daily Timing**

Burrowing owls are active throughout the day; however, peaks in activity in the morning and evening make these the best times for conducting surveys (Conway and Simon 2003). Surveys should be conducted in the early morning (1/2 hour before sunrise until 2 hours after sunrise) and early evening (2 hours before sunset until 1/2 hour after sunset).

### **Number and locations of survey points**

Burrowing owls are most frequently located visually, thus, obtaining a clear view of the entire prairie dog town is necessary. For small prairie dog towns that can be adequately viewed in their entirety from a single location, only one survey point is necessary. The survey point should be selected to provide unobstructed views (with binoculars if necessary) of the entire prairie dog town

(burrow mounds and open areas between) and all nearby structures that may provide perches (e.g., fences, utility poles, etc.)

For prairie dog towns that can not be entirely viewed from a single location because of terrain or size, enough survey points should be established to provide unobstructed views of the entire prairie dog town and nearby structures that may provide perches. Survey locations should be separated by approximately 800 meters (1/2 mile), or as necessary to provide adequate visual coverage of the entire prairie dog town.

#### **Number of surveys to conduct**

Detection of burrowing owls can be highly variable and multiple visits to each site should be conducted to maximize the likelihood of detecting owls if they are present. At least three surveys should be conducted at each survey point. Surveys should be separated by approximately one week.

#### **Conducting the survey**

- **Weather Considerations** Because poor weather conditions may impact the ability to detect burrowing owls, surveys should only be conducted on days with little or no wind and no precipitation.
- **Passive surveys** Most burrowing owls are detected visually. At each survey location, the observer should *visually* scan the area to detect any owls that are present. Some burrowing owls may be detected by their call, so observers should also *listen* for burrowing owls while conducting the survey.

Burrowing owls are frequently detected soon after initiating a survey (Conway and Simon 2003). However, some burrowing owls may not be detected immediately because they are inconspicuous, are inside of burrows, or are not present on the site when the survey is initiated. We recommend that surveys be conducted for 10 minutes at each survey location.

- **Call-broadcast surveys** To increase the likelihood of detecting burrowing owls, if present, we recommend incorporating call-broadcast methods into burrowing owl surveys. Conway and Simon (2003) detected 22% more burrowing owls at point-count locations by broadcasting the primary male (*coo-coo*) and alarm (*quick-quick-quick*) calls during surveys. Although call-broadcast may increase the probability of detecting burrowing owls, most owls will still be detected visually.
- We recommend the following 10-minute timeline for incorporating call-broadcast methods (Conway and Simon 2003, C. Conway pers. commun.). The observer should scan the area for burrowing owls during the entire survey period.
  - 3 minutes of silence
  - 30 seconds call-broadcast of primary call (*coo-coo*)
  - 30 seconds silence
  - 30 seconds call-broadcast of primary call (*coo-coo*)
  - 30 seconds silence
  - 30 seconds call-broadcast of alarm call (*quick-quick-quick*)
  - 30 seconds silence
  - 4 minutes of silence

Calls can be broadcast from a "boom box", a portable CD or cassette player, or an mp3 player attached to amplified speakers. Calls should be broadcast loudly but without distortion.

Recordings of this survey sequence (compact disc or mp3 sent via email) are available free of charge by contacting:

David Klute  
Bird Conservation Coordinator  
Colorado Division of Wildlife  
6060 Broadway  
Denver, CO 80216  
Phone: 303-291-7320  
Email: David.Klute@state.co.us

#### **Identification**

Adult burrowing owls are small, approximately 9-11 inches. They are brown with white spotting and white barring on the chest. They have long legs in comparison to other owls and are frequently seen perching on prairie dog mounds or other suitable perches (e.g., fence posts, utility poles) near prairie dog towns. Juvenile burrowing owls are similar to adults but smaller, with a white/buff colored chest that lacks barring.

General information about burrowing owls is available from the Colorado Division of Wildlife website:

<http://wildlife.state.co.us/WildlifeSpecies/Profiles/Birds/BurrowingOwl.htm>

Additional identification tips and information are available from the U.S. Geological Survey Patuxent Wildlife Research Center website:

<http://www.mbr-pwrc.usgs.gov/id/fram1st/i3780id.html>

#### **What To Do If Burrowing Owls Are Present**

If burrowing owls are confirmed to be present in a prairie dog town, there are two options before proceeding with planned activities:

1. Wait to initiate activities until after November 1st or until it can be confirmed that the owls have left the prairie dog town.
2. Carefully monitor the activities of the owls, noting and marking which burrows they are using. This is not easy to accomplish and will require considerable time, as the owls may use several burrows in a prairie dog town. When all active burrowing owl burrows have been located and marked, activity can proceed in areas greater than 150 feet from the burrows with little danger to the owls. Activity closer than 150 feet may endanger the owls.

#### **Reference**

Conway, C. J. and J. C. Simon. 2003. Comparison of detection probability associated with Burrowing Owl survey methods. *Journal of Wildlife Management* 67:501-511.

*revised 02/2008*

*See also: "Controlling Prairie Dogs: Suggestions For Minimizing Risk To Non-Target Wildlife Species" Colorado Division of Wildlife 03/2007*

1/2/2018

Frank McGee  
Area Wildlife Manager  
Colorado Parks and Wildlife  
425 Sinton Road  
Colorado Springs, CO 80907

Dear Mr. McGee,

Thank you for taking time to review the Front Range-Midway Solar Project (Project) Wind Solar Energy Overlay (WSE-O) application submitted to El Paso County on October 24, 2017. The proposed Project is a 102 mega-watt solar energy facility developed by the Front Range Midway Solar Project, LLC, a wholly owned subsidiary of Tradewind Energy, Inc. (TWE). TWE takes a conservative approach to environmental due diligence through voluntarily conducting multiple environmental studies and initiating early coordination with the U.S. Fish & Wildlife Service and state wildlife agencies so that projects can be designed to avoid and minimize significant impact to natural resources. The Project initiated coordination with the USFWS and the Colorado Parks and Wildlife (CPW) in 2014; and responses from both agencies were received and have been incorporated into Project development and design.

The November 15, 2017 letter from the CPW to the El Paso County Planning and Community Development Department identified several concerns and made recommendations regarding the Project's potential impact to natural resources. The concerns and recommendations were consistent with those identified in the August 25, 2014 letter from CPW to TWE, which have been carefully considered and implemented into Project development and design. CPW recommendations and the Project's responses are listed below.

**CPW Recommendation**

*CPW recommends the habitat with water on the Project area remain undisturbed and contiguous with undeveloped land around it. CPW would be happy to work with FRMW and consultants to help identify potential layouts within the proposed footprint that would avoid or minimize potential impacts to these species.*

**Project Response**

A wetlands survey was completed for the Project site in 2015. The study identified a single water feature: a stock pond created by damming a dry drainage way on site. The stock pond did not include characteristics of jurisdictional waters, but Project infrastructure will avoid the water feature and surrounding area nonetheless. Project design is still preliminary, but it is anticipated that the Project fence line will be setback, at minimum, approximately 150 feet.

**CPW Recommendation**

*CPW prefers that native vegetation be retained on-site during the operational lifespan of the Project. Proper reclamation, from a wildlife perspective, involves not only stabilizing the soil and establishing ground cover, but fostering plant communities with a diversity of species and plant types which will fully serve the nutritional needs of wildlife. Strict adherence to the NRCS's recommendations is advised. CPW would appreciate the opportunity to review the Project's Noxious Weed Management Plan prior to construction.*

**Project Response**

The local Natural Resources Conservation Service - El Paso County office reviewed the Project's noxious weed management plan (NWMP) and commented that they were satisfied with the NWMP. The NWMP is available for review on the El Paso County Development Application Review website. Per the NWMP, the site will be re-vegetated with a native seed mix. Site stabilization will be monitored per the Storm Water Management Plan (SWMP) and the Grading and Erosion Control Plan (GEC), which requires vegetation coverage reach 70 % before ceasing site monitoring activities.

**CPW Recommendation**

*CPW recommends a smooth top to the fence to prevent wildlife from impaling themselves. If wildlife exclusion fencing is installed CPW would request that the solar facility is checked regularly or structures are installed to allow animals to escape, in the unlikely event that a deer or other wildlife become trapped in the facility.*

**Project Response**

The Project will utilize security fence with barbed-wire strands to prevent trespassing and minimize the risk of electrocution. The security fence will be a total of seven feet in height and include six feet of chain link fencing and one foot of barbed wire strand. The security fence will also act as exclusion fencing to keep wildlife out. Per the CPW *Fencing with Wildlife in Mind*, a 7 to 8 foot fence is an effective barrier to deer and elk. Operation and maintenance staff will routinely visit the site and will be trained to contact the CPW – District Wildlife Manager if trapped wildlife within the solar facility cannot be easily released.

**CPW Recommendation**

*CPW recommends that new lines follow existing transmission line infrastructure corridors wherever possible. Also recommend that FRMW consult "Suggested Practices for Avian Protection on Power Lines, the State of the Art in 2006" and the "Reducing Avian Collisions with Power Lines: The State of the Art in 2012" for proper design considerations to minimize raptor electrocution.*

**Project Response**

The Project substation will tie in to one of two existing substations within the Project boundary via a new Project transmission line. The Project transmission line will be located entirely within the Project; the length will be determined prior to construction, but will not exceed approximately 1,500 feet. The Project transmission line will be located immediately adjacent to existing transmission lines. See attached *Front Range Midway Solar Project Existing Transmission Lines Map*. The Project will consult the cited documents for proper design considerations to minimize raptor electrocution.

**CPW Recommendation**

*Consultation with US Fish and Wildlife Service (USFWS) is recommended to ensure compliance with the MBTA and the BGEPA. Surveys for active nests should occur prior to construction should construction occur during the breeding and nesting season.*

**Project Response**

The Project has been developed in coordination with the USFWS. A July 29, 2014 response letter from USFWS included several recommendations for the Project. The recommendations were reviewed and in 2015, a qualified third-party biologist was engaged to conduct a threatened and endangered species survey for the Project. The study is available for review on the El Paso County Development Application Review website. If Project construction occurs during the nesting season, between March 1 and October 31, additional surveys will be conducted so that appropriate avoidance and minimization measures can be implemented during construction.

**CPW Recommendation**

*There is suitable habitat on the site for nesting raptors. CPW recommends the use of preconstruction surveys, as well as continuation of those surveys during construction, to identify all raptor nests within the Project area and implement appropriate restrictions. CPW recommends adherence to the "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors".*

**Project Response**

The Project has noted in the WSE-O Letter of Intent (LOI) that if construction occurs between March 1 and October 31, pre-construction surveys will be conducted so that avoidance and minimization measures can be implemented during construction. The WSE-O LOI is available for review on the El Paso County Development Application Review website.

**CPW Recommendation**

*CPW recommends taking special precautions regarding burrowing owl, black-tailed prairie dog, swift fox, mountain plover, Townsend's big eared bat, and northern leopard frog.*

**Project Response**

Based on the threatened and endangered species study completed for the Project in 2015, black tailed prairie dog (State Species of Concern) was identified on the Project Site. Prairie dog colonies are potential habitat for burrowing owl (State Threatened). Per previous CPW recommendations, the prairie dogs will be relocated prior to commencing earth-moving activities. If a relocation site is not available, prairie dogs will be humanely treated prior to construction. Furthermore, the Project will follow CPW recommended measures to avoid impact to the burrowing owl. If construction occurs between March 1<sup>st</sup> and October 31<sup>st</sup>, the site will be surveyed for the presence of burrowing owls prior to commencing earth-moving activities. If burrowing owls are identified, their habitat will be avoided until after the owls have migrated from the area. A qualified biologist will perform the pre-construction surveys and monitor any burrowing owls identified during construction. Swift fox have the potential to occur in the Project area; however, by relocating or humanely eradicating black tailed prairie dogs prior to commencing construction, the likelihood for swift fox occurrence within the Project area will be minimized. Roosting habitat for Townsend's big-eared bat was not identified within the Project area; however, the species could use the stock pond on site to forage. The stock pond on-site will not be impacted by Project infrastructure. Suitable habitat for the northern leopard frog was not identified on the Project site.

We hope the above responses adequately address CPW concerns and recommendations regarding the Front Range-Midway Solar Project. If you have questions or concerns, or require additional information please do not

hesitate to contact us using the information provided below. TWE would enjoy the opportunity to further discuss the Project with CPW.

Dave Iadarola  
Project Manager  
(720) 732-3154  
[diadarola@tradewindenergy.com](mailto:diadarola@tradewindenergy.com)

Or

Emily Truebner  
Environmental Manager  
(913) 953-5225  
[etruebner@tradewindenergy.com](mailto:etruebner@tradewindenergy.com)

Sincerely,

*Dave Iadarola*

Dave Iadarola  
Project Manager

**Attachment:** Front Range Midway Solar Project Existing Transmission Lines Map