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1041 Documents Related to 2.405 Review Criteria for All Applications

For

Williams Creek Generating Station

Application Submittal Requirements of El Paso County Guidelines and Regulations for Areas and Activities of State Interest Article 2.405

2.405 Review Criteria for all Applications

In addition to the review criteria listed at Sections 3.202, 4.202, 5.202, 6.202, 7.202, 8.202, and 9.202 all applications under these Regulations shall be evaluated against the following general criteria. Following some, but not all of the criteria listed in the above Sections and below are lists of considerations. These considerations are not criteria that the Project must satisfy; they serve solely as guidance. Where such terms as "reasonable," "feasible" and "adequate" are used in the foregoing criteria, the Development Services Director and/or the Permit Authority shall determine in each case what is or is not reasonable, feasible or adequate.

In accordance with Section 2.405 of the Appendix B - Guidelines and Regulations for Areas and Activities of State Interest of the El Paso County Colorado Land Development Code (El Paso County §1041 Regulations; El Paso County 2024b), the information in this document describes how the site selection, construction, maintenance, and operation of the proposed Williams Creek Generating Station and associated infrastructure will comply with the applicable review criteria. Each criterion for all applications from Section 2.405 is listed, followed by a description of how the project will comply.

2.405(1) The health, welfare and safety of the citizens of this County will be protected and served.

The location, construction, and operation of the WCGS will comply with applicable federal, state, and local regulations. The remote location of the propose facility will allow for full mitigation of any potential impacts associated with Electric and Magnetic Fields (EMF) and any operational noise impacts (see Attachments T and KK). Potential impacts pertaining to wildfire hazards, geologic conditions, floodplains, traffic, lighting, hazardous materials, air quality and other similar use-specific have been fully evaluated and addressed in the attachments to this application and will be further developed at the Site Development Plan and associated Construction Drawing Review stages of development.

2.405(2) 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 detailed discussion of the project's compliance with the El Paso County Master Plan is provided in the response to Section 2.303(7)(c) of the Article 2.303 Submission Requirements For All Permit Applications document provided as part of this Application. The discussion includes specific analysis of the project's compliance with: Chapter 3, Land Use; Chapter 8, Infrastructure, the El Paso County Water Master Plan, the El Paso County Parks Master Plan, and the 2024 Major Transportation Corridors Plan. The project is not within the review and approval prevue of Pikes Peak Area Council of Governments with respect to the Regional Water Quality Management Plan (208 Plan) (see analysis provided in response to 2.303(7)(d) of Article 2.303). The project will comply with all stormwater requirements of the State of Colorado and El Paso County, including installation and maintenance of best management practices to manage and reduce pollutant discharge into state waters.

2.405(2)(a) Likelihood that the Project will/will not cause or contribute to urban sprawl or "leapfrog" development.

Williams Creek Generating Station is one of the projects included in the Sustainable Energy Plan (SEP) portfolio. The project involves installation of 10 simple cycle combustion turbines that will provide 400 MW of natural gas-fueled electric generation supported by a 6.5 million gallon raw water storage tank, a water pump house with water treatment systems for potable water, a Zero Liquid Distribution System to process the effluent from the power plant and a central control building. The turbines are hydrogen capable with future modifications. They will support renewable generation by supplementing energy demands during peak load times as they're quick start is able to produce energy within 10 minutes.

The Williams Creek Generating Station is a critical infrastructure project that will help Colorado Springs Utilities meet our community's evolving energy needs while advancing our long-term energy transition strategy. The facility will provide 400 megawatts of natural gas-based electric generation through 10 fast-start generating units, using technology similar to the generators previously located at the Martin Drake Power Plant. As Colorado Springs Utilities continues to add renewable energy and battery storage resources to its portfolio, additional flexible generation is needed to maintain electric reliability, support compliance with state regulations, reduce carbon emissions, and serve the growing needs of current and future customers. The Williams Creek Generating Station will play an essential role in balancing these objectives by providing dispatchable power that can quickly respond to fluctuations in customer demand and renewable energy production. The project is strategically located on utility-owned property southeast of Fountain and leverages existing utility infrastructure. The site's proximity to the Williams Creek Substation,

Add statement: 1This area of County where site is proposed is NOT anticipated to cause leapfrog development; residential and commercial development is not desirable at this location due to...
2Existing large scale utility providers exist and it is feasible that additional utility providers would settle in this area due to the existing power generation facilities producing energy for El Paso County residents/commercial businesses which is consistent with the character of the area..

Southern Delivery System, and other utility facilities supports efficient project development, operational flexibility, and long-term value for customers. Once operational in 203, the Williams Creek Generating Station will provide a reliable and flexible energy resource that supports system reliability, community growth and the continued transition to a cleaner energy future.

2.405(2)(b) Significant changes in the amount of impervious surfaces.

Construction of the project will increase impervious surface on the site, however, impacts associated with the increase will be mitigated via onsite stormwater detention facilities. The construction of the WCGS will not change existing topography, or adversely affect drainage. Only minor onsite alterations in the pattern or intensity of surface drainage will result from the construction of the project. Once construction has been completed, disturbed areas will be revegetated and all stormwater impacts will be mitigated via onsite drainage improvements.

2.405(2)(c) Contiguity of development associated with the Project to existing growth centers.

The WCGS is immediate contiguous with previously approved and constructed utility infrastructure, including multiple solar arrays, two electric substations, a raw water pump station, and a raw water pipeline. The originally proposed location for the power plant was at the Horizon Utility Campus located at the southwest corner of the Drennan Road and Foreign Trade Zone Boulevard intersection. However, the proposed plant was ultimately relocated to the subject property due to potential impacts associated with the proximity of the Horizon Utility Campus' proximity to the Colorado Springs Airport. As a result, relocating the plant to location that was a greater distance from the Colorado Springs Airport, and by association the urbanized Colorado Springs Metropolitan area, became necessary.

2.405(2)(d) Changes to unique land forms.

The Natural Landforms, Vegetation & Wetlands Report (Attachment S) prepared in support of this application identifies that the most significant features on the site are a manmade berm and drainage swale. The Report goes on to state that "there were few other natural landforms or significant topography on the site" and that "the site has a very gentle southwesterly slope and almost no topographically significant features." The plan for development will account for the drainage swale, as identified and discussed in the associated Drainage Report (Attachment K). Construction activity traffic and hauling will be limited to existing private roadways and onsite staging areas in order to prevent any unnecessary or unprotected erosion impacts to the landscape.

2.405(2)(e) Changes in the amount or character of open space.

The overall 3,654-acre parcel owned by the City of Colorado Springs is largely undeveloped. Development of the property is not restricted by any existing open

space easements or conservation easements and the proposed WCGS will only impact a small percentage of the overall parcel. The character of the remaining vacant portions of the property will remain unchanges.

2.405(2)(f) Changes to traffic patterns, road capacity and congestion.

Traffic-related impacts associated with the project will be limited to construction activities. The Traffic Impact Study (Attachment Y) included in this application identifies the trip projections for the project and evaluates the transportation impacts of the project. The Study concludes that "Analysis of future traffic conditions indicates that the addition of site-generated traffic is expect to create minimal negative impact to traffic operations for the existing and surrounding roadway system upon roadway and intersection control improvements assumed within this analysis." Based on this analysis, the project will not adversely impact traffic patterns, road capacities or congestion.

Add discussion on construction related impacts please. Please reference haul route and potential collateral development agreement to ensure any damage is corrected at applicants expense

2.405(3) The Project is financially feasible. The determination of financial feasibility of the Project may include but is not limited to the following considerations:

2.405(3)(a) The business plan submitted by the applicant.

2.405(3)(b) Relevant bond issue, loan and other financing approval or certifications (ex: approved bond issue; bond counsel opinion).

The Colorado Springs Utilities 2026 Annual Operating and Financial Plan has been included at Attachment P to this application. The Plan provides the financial feasibility of the project.

2.405(4) 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:

2.405(4)(a) Faults and fissures.

Structural design of the project will follow the International Building Code and ASCE 7 criteria, including Risk Category III, a seismic importance factor of 1.25, A-1 preliminary Site Class C and Seismic Design Category A, a 135-mph design wind speed and Exposure C. The geotechnical investigation prepared by Entech Engineering (Attachment J) identified expansive and collapsible clay and claystone and groundwater in one boring at approximately 17.5 feet below ground surface. The preliminary report identifies potential measures including drilled-pier foundations or mitigated shallow foundations, moisture conditioning, suitable structural fill, excavation controls and final foundation design based on additional investigation.

2.405(4)(b) Unstable slopes including landslides, rock slides and avalanche areas.

Attachments K, M, and N provide analysis of risks to the project associated with drainage impacts, avalanches, and landslides or rockslides, respectively. There is no historic evidence of avalanches, landslides, or rockslides on the property, therefore, the risks therefrom are minimal if any. Risks pertaining to unstable slopes and drainage impacts to such slopes is minimal as the site exists today, and any future risks can be mitigated via site grading and soil stabilization during construction of the proposed WCGS.

2.405(4)(c) Expansive or evaporative soils and risk of subsidence.

The geotechnical investigation prepared by Entech Engineering (Attachment J) identified expansive and collapsible clay and claystone and groundwater in one boring at approximately 17.5 feet below ground surface. The preliminary report identifies potential measures including drilled-pier foundations or mitigated shallow foundations, moisture conditioning, suitable structural fill, excavation controls and final foundation design based on additional investigation.

2.405(4)(d) Wildfire hazard areas.

please provide correspondence with Hanover Fire' provide will serve letter; are there any Ai Fire Watch cameras?

Wildfire hazard risks have been evaluated for the project as discussed in detail in Attachment L. The Wildland Fire Risk and Hazard Mitigation Plan identifies the property as having a “Moderate” wildfire risk per the WSFS Wildfire Risk to Communities Program. The Plan also provide an exhibit (Figure 7) which depicts the property as being “Low” and “Moderate” on the Fire Intensity Scale, which takes into account significant fuel hazards and potentially dangerous fire behavior characteristics. The Plan also provides recommended mitigation measures for facilities such as the WCGS, including installing a noncombustible perimeter around the facility, mowing grass fuels within perimeter fencing, and mowing access roads to create additional fire breaks. Colorado Springs Utilities will incorporate mitigation measures during the construction of the facility and has provided a plan for providing ongoing maintenance.

2.405(4)(e) Floodplains.

The site does not include a FEMA regulated floodplain.

2.405(5) 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:

2.405(5)(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.

2.405(5)(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.

2.405(5)(c) Need for temporary roads to access the Project for construction and maintenance.

2.405(5)(d) Change in demand for public transportation.

No new or upgraded public services or facilities are anticipated to be needed to serve the WCGS in El Paso County, except for those electric service lines and water supply lines provided by Colorado Springs Utilities. Operations of facility will not create any impacts to schools, bus routes, water and wastewater treatment, water supply, emergency services, transportation, and other local infrastructure. Construction will exclusively occur on property owned by the City of Colorado Springs Traffic impacts will be limited to those associated with construction activities and any degradation of County roads due to construction hauling has been addressed in the associated development agreement.

2.405(6) 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:

2.405(6)(a) Changes to existing and projected visitor days.

2.405(6)(b) Changes in quality and quantity of fisheries.

2.405(6)(c) Changes in instream flows or reservoir levels.

2.405(6)(d) Changes in access to recreational resources.

2.405(6)(e) Changes to quality and quantity of hiking, biking, or horseback riding trails.

2.405(6)(f) Changes to hunting experiences.

2.405(6)(g) Changes to open space.

2.405(6)(h) Changes to existing conservation easements.

2.405(6)(i) Changes to regional or neighborhood parks.

The subject parcel does not currently include any recreational opportunities or

experiences for the general public. Construction of the WCGS will not impact existing recreational open space areas or other recreational opportunities. The nearest planned recreational facilities are two planned County regional trails, both of which have planned alignments located south and west of the boundaries of the current parcel boundaries and well beyond the boundaries of the new parcel that will be created by the associated land survey plat.

2.405(7) 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:

provide correspondance that permit has been applied for through CDPHE

2.405(7)(a) Changes in visibility and microclimates.

2.405(7)(b) Applicable air quality standards.

The WCGS stationary emission sources are subject to the CDPHE Air Pollution Control Division (APCD) Air Quality Control Commission (AQCC) Regulation No. 1 – Emission Control for Particulate Matter, Smoke, Carbon Monoxide, and Sulfur Oxides (Regulation 1), No. 2 – Odor Emission (Regulation 2), No. 3 – Stationary Source Permitting and Air Pollutant Emission Notice Requirements (Regulation 3), No. 15 – Control of Emissions of Ozone-Depleting Compounds (Regulation 15), and No. 26 – Control of Emissions from Engines and Major Stationary Sources (Regulation 26). Compliance with all CDPHE standards will ensure the project does not significantly degrade air quality

2.405(8) 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:

2.405(8)(a) Visual changes to ground cover and vegetation, waterfalls and streams, or other natural features.

2.405(8)(b) Interference with viewsheds and scenic vistas.

2.405(8)(c) Changes in landscape character types of unique land formations.

2.405(8)(d) Compatibility of structure size and color with scenic vistas and view sheds.

2.405(8)(e) Changes to open space.

2.405(8)(f) Changes to existing conservation easements.

2.405(8)(g) Changes to impacts to regional or neighborhood parks.

Construction and operation of the WCGS will result in minimal visual changes to ground cover in the areas of ground disturbance and will not change or otherwise alter any unique land formations as discussed in Attachment S. Attachments U and V include photo

simulations and structure elevations which depict the minimal visual impact of the facility in the respective area. In addition, a Visual Impact Analysis has been provided utilizing online three dimensional mapping software that clearly shows the screening value of the varied topography surrounding the site, which importantly includes reducing the overall visibility of the station from the general public traveling along Interstate 25 looking east.

2.405(9) 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:

2.405(9)(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.***

2.405(9)(b) ***Applicable narrative and numeric water quality standards. 2.405(9)(c)***

Changes in point and nonpoint source pollution loads.

2.405(9)(d) ***Increase in erosion.***

2.405(9)(e) ***Changes in sediment loading to waterbodies. 2.405(9)(f)***

Changes in stream channel or shoreline stability.

2.405(9)(g) ***Changes in stormwater runoff flows.***

2.405(9)(h) ***Changes in trophic status or in eutrophication rates in lakes and reservoirs.***

2.405(9)(i) ***Changes in the capacity or functioning of streams, lakes or reservoirs.***

2.405(9)(j) ***Changes to the topography, natural drainage patterns, soil morphology and productivity, soil erosion potential, and floodplains.***

2.405(9)(k) ***Changes to stream sedimentation, geomorphology, and channel stability.***

2.405(9)(l) ***Changes to lake and reservoir bank stability and sedimentation, and safety of existing reservoirs.***

A Preliminary Drainage Report (Attachment K) has been provided in support of this application. The Report evaluates the existing and proposed conditions of the site and concludes that the preliminary design of the facility will comply with the County's drainage criteria. In fact, the primary downstream design point is projected to see a 20.3% decrease in stormwater flows due to the introduction of an onsite stormwater detention pond. The site improvements will improve soil stability and allow stormwater runoff to be controlled, thereby reducing the impacts to downstream properties. The site will be required to provide water quality treatment and will include stormwater BMPs during earthwork activities to mitigate off site soil transfers. Construction of the plant will not result in negative impacts to downstream lakes, reservoirs, or streams. The stie is

not included with a FEMA floodplain.

2.405(10) 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:

2.405(10)(a) ***Changes in aquifer recharge rates, groundwater levels and aquifer capacity including seepage losses through aquifer boundaries and at aquifer-stream interfaces.***

2.405(10)(b) ***Changes in capacity and function of wells within the impact area.***

2.405(10)(c) ***Changes in quality of well water within the impact area.***

Is the water to be reused (closed system) so as to not draw from nearby water wells. Please state so concerned citizens understand

WCGS will not impact aquifers or wells. There are no known groundwater aquifers in the area. However, it should be noted that the design and construction of the facility will mitigate negative impacts to groundwater contamination to the extent practicable. The facility will use the existing Southern Delivery System to deliver water supplies already owned and controlled by Colorado Springs. Raw water delivered through Southern Delivery System will be treated by Reverse Osmosis (RO) for industrial use at the power plant and through a conventional potable water treatment system for potable use. RO brine will be treated at an on-site ZLD system. Remaining brine from the ZLD treatment will be evaporated on site in concrete basins and therefore will result in no discharges to ground or surface water. The wastewater generated from domestic water use will be handled through a septic system designed and constructed to be compliant with El Paso County Health standards. Facility stormwater conveyance and detention systems will be designed in accordance with the El Paso County Drainage Criteria Manual and permanent stormwater flows will not exceed pre-construction levels.

2.405(11) 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.

A Natural Landforms, Vegetation, and Wetlands Report (Attachment S), prepared by Bristlecone Ecology, was submitted in support of this application. Bristlecone Ecology completed analysis on wetlands and waters of the U.S. The final response was that no jurisdictional wetlands or waters were found on site. No further action is required for site construction (see Attachment S, Natural Landforms, Vegetation, and Wetlands Report). Bristlecone did conclude, however, that “some wetland vegetation could be disturbed along the haul road alignment, depending on the route chosen.” If improvements to the haul road are required prior to hauling activities and those areas of construction impact wetlands, then a permit from the U.S. Army Corps of Engineers (USACE) for construction in the wetland area may be required and would be obtained prior to any

While jurisdictional wetlands were not identified, a riparian corridor does appear to be present and planned to be rerouted. Please state that impacts to riparian corridor will not impact downstream properties due to sheet flow or change in drainage, and Flora/Fauna habitat may be relocated at XXXX if that is the case

construction activities occurring in these areas. If a USACE permit is required, work is anticipated to be performed under a USACE Nationwide Permit.

2.405(12) 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:

2.405(12)(a) Loss of topsoil due to wind or water forces

2.405(12)(b) Changes in soil erodibility

2.405(12)(c) Physical or chemical soil deterioration

2.405(12)(d) Terrain deformation/mass wasting/subsidence

2.405(12)(e) Compacting, sealing and crusting

2.405(12)(f) Waterlogging

2.405(12)(g) Soil morphology and productivity

The project will incorporate conservation measures during both construction and operation. Construction measures will include limiting disturbance to approved work areas, stabilizing exposed soils, controlling erosion and sediment, managing stormwater through approved ditches, culverts and swales, properly storing fuels and chemicals, maintaining spill-response materials, and promptly stabilizing or restoring temporary disturbance. Project effects on soils and geologic conditions will result primarily from clearing, grading, excavation for foundations and utilities, compaction, road and laydown-area construction, detention or drainage improvements and placement of structural fill. The principal identified constraints are expansive and collapsible native clay and claystone. These conditions will be managed through the foundation system selected during final design, removal or treatment of unsuitable material, moisture conditioning, use of approved non-expansive fill, controlled lift placement, compaction testing, stable excavation slopes or shoring, and sulfate-resistant concrete where required.

2.405(13) The Project will not cause a 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.

Construction and operation may generate temporary or localized noise, light, dust, exhaust, vibration and odors. Construction effects will be minimized through reasonable work-hour controls, maintained equipment, dust suppression, stabilized access routes, proper material handling and compliance with applicable air-quality and nuisance

requirements.

Operational noise will be controlled through equipment selection, turbine and generator enclosures, silencers and other acoustic measures to be evaluated in the final project noise study (see Attachment T, Sound Study Report). Exterior lighting will be limited to that needed for safe operation and security and will be directed and shielded to reduce off-site glare to the extent practicable. Combustion emissions will be controlled through permitted equipment and emissions-control systems, and potential off-site odor effects will be evaluated using the final process and chemical-handling design. Rotating equipment will be mounted and maintained to control vibration. A near-field guarantee of 85 dBA as a spatial average around individual equipment envelopes and a far-field guarantee of 75 dBA for normal steady-state operation of contractor-supplied equipment at selected property-boundary locations will be provided. The near-field value is not a cumulative in-plant limit, and the far-field demonstration is subject to the stated free-field and external-source qualifications.

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:

Provide report

2.405(14)(a) Plans for compliance with federal and state handling, storage, disposal, and transportation requirements.

2.405(14)(b) Use of waste minimization techniques.

2.405(14)(c) Adequacy of spill prevention and response plans.

Is this a clean up by CSU or Hanover Fire? Does the Fore District have the equipment to do this?

The WCGS will utilize, store, and generate limited quantities of solid waste, petroleum products, and regulated chemical substances associated with normal power plant operations. No explosives will be used or stored on site. See Attachment FF, Hazardous Materials, for a description of the hazardous materials associated with normal plant operation. Chemical and waste storage around the two water treatment processes on the site, and the location of each storage area is shown on the Plot Plan and in site context on the Civil Site Plan in Attachment FF Hazardous Materials.

Processed wastewater from the power plant is managed entirely onsite, because the site has no proximity to existing wastewater infrastructure. Plant wastewater is first directed to an equalization basin, which provides approximately sixty days of temporary storage ahead of treatment and includes a forwarding pump structure. From the equalization basin the water is processed through the ZLD system, where mechanical vapor recompression brine concentrators evaporate water to produce a high-quality distillate that is recovered and returned to service. The concentrated brine remaining after that process is directed to solar evaporation basins, which provide storage and final disposal and are sized so that net evaporation matches or exceeds the brine flow

rate from the concentrator system. The equalization basin and the solar evaporation basins are designed to be compliant with or exempt from Colorado Department of Public Health and Environment Solid Waste Regulation Section 9, and permit documentation for the basins will include written approvals from the CDPHE Hazardous Materials and Waste Management Division. Solids accumulation rates and cleanout frequencies are estimated for each basin and submitted for review. These are processed water, non-discharge facilities: they are hydraulically isolated from the stormwater conveyance system, excluded from the stormwater routing model documented in the Preliminary Drainage Report, and site grading directs stormwater around the basin embankments rather than into them.

2.405(15) Urban development, population densities, and site layout and design of 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:

2.405(15)(a) ***Proximity of urban development and population densities to aquifer recharge areas.***

2.405(15)(b) ***Proximity of stormwater and sanitation systems to aquifer recharge areas.***

2.405(15)(c) ***Changes in water quality in the aquifer recharge areas.***

The project will incorporate conservation measures during both construction and operation. Construction measures will include limiting disturbance to approved work areas, stabilizing exposed soils, controlling erosion and sediment, managing stormwater through approved ditches, culverts and swales, properly storing fuels and chemicals, maintaining spill-response materials, and promptly stabilizing or restoring temporary disturbance. Excess excavated material will be managed at a Springs Utilities-approved location. Operational measures will include metering and controlling water use, collecting process wastewater for conveyance to the Springs Utilities-designated system, using secondary containment for oil- and chemical-handling areas, collecting turbine-wash water and oily drains in protected tanks, and maintaining equipment to minimize leaks, emissions, noise and unnecessary resource consumption. These measures will be implemented through the final grading and drainage plans, Erosion Stormwater Quality Control Permit (ESQCP) and stormwater controls, SPCC Plan, operating procedures, and applicable permit conditions. This area of the County is not known to have an underlying groundwater aquifer, therefore, recharge is not likely.

2.405(16) 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:

2.405(16)(a) Relationship to reasonable growth projections and local land use plans.

2.405(16)(b) Relationship to other providers' service areas.

2.405(16)(c) Whether the Project is not in compliance with regulatory or technological requirements or will not be in compliance in the near future.

Williams Creek Generating Station (WCGS) is one of the projects included in Springs Utilities' Sustainable Energy Plan (SEP) portfolio. The project involves installation of 10 simple-cycle combustion turbines that will provide 400 megawatts (MW) of natural gas-fueled electric generation supported by a 6.5-million-gallon raw-water storage tank, a water-pump house with water-treatment systems for potable water, a zero-liquid-discharge system to process the effluent from the power plant and a central control building. The turbines are hydrogen capable with future modifications.

The WCGS is a critical infrastructure project that will help Springs Utilities meet its community's evolving energy needs while advancing its long-term energy transition strategy. The facility will provide 400 megawatts of natural gas-based electric generation through 10 fast-start generating units capable of producing energy within 10 minutes, using technology similar to the generators located at the previous Martin Drake Power Plant. As Springs Utilities continues to add renewable energy and battery storage resources to its portfolio, this fast-start generation provides flexibility and reliably supports electrical demands during peak usage, support compliance with state regulations, reduce carbon emissions, and serve the growing needs of current and future customers. The project is strategically located on City of Colorado Springs-owned property southeast of Fountain and leverages existing utility infrastructure. The site's proximity to the Williams Creek Substation and Southern Delivery System supports efficient project development, operational flexibility, and long-term value for customers. Once operational in 2030, the WCGS will provide a reliable and flexible energy resource that supports system reliability, community growth, and the continued transition to a cleaner energy future.

The City of Colorado Springs has experienced consistent growth in both housing and businesses and as a result the overall demand for electricity has increased. It is anticipated that the electrical demand in 2045 will be over 1,570 MW (See Table 3-1 in Exhibit 2026 EIRP). In 2026, the peak summer season load was 1,068 MW. Utilities'

Please add that unincorporated residents and commercial users also benefit by CSU power

existing generation resources include a mix of coal, combustion turbines, combined cycle, and hydro which only allow for 1,001 MW if running simultaneously. For this reason, Springs Utilities has included a variety of renewable resources across their portfolio through Power Purchase Agreements (PPAs) to supplement as well as focus on the overall State goal of reducing emissions by 80% in 2030.

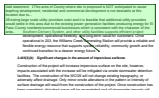
Because renewable energy is not 100% reliable, these peaking units fueled by natural gas are an efficient fuel source that can start up in 10-minutes and bridge the energy demands to ensure our rate payers have the reliable electricity they expect.

The closure of the Ray D. Nixon (Nixon) coal-fired power plant by December 31, 2032 (originally Dec. 31, 2029), will reduce capacity on Springs Utilities' system by over 200 MW. Closure of the plant is at the direction of the State of Colorado due to regulated 80% reduction in emissions by 2032. In addition, between now and the Nixon Power Plant closure date, load growth is still expected to grow by at least 12.5%, which doesn't include potential large load customers. See section 2.303(5d) above for alternatives considered and rejected. The need for the WCGS at a generating capacity of 400MW is to cover the loss of capacity with closure of the Nixon Power Plant (208 MW), to account for future anticipated growth, and to bridge less-reliable renewable energy resources while still providing reliable electric service 99% of the time as expected by customers.

The WCGS stationary emission sources are subject to the CDPHE Air Pollution Control Division (APCD) Air Quality Control Commission (AQCC) Regulation No. 1 – Emission Control for Particulate Matter, Smoke, Carbon Monoxide, and Sulfur Oxides (Regulation 1), No. 2 – Odor Emission (Regulation 2), No. 3 – Stationary Source Permitting and Air Pollutant Emission Notice Requirements (Regulation 3), No. 15 – Control of Emissions of Ozone-Depleting Compounds (Regulation 15), and No. 26 – Control of Emissions from Engines and Major Stationary Sources (Regulation 26). PPACG does not regulate air emission sources.

V1_1041 Documents Related to 2.405 Review Criteria for All Applications.pdf Markup Summary

dsdparsons (9)



Subject: Planner
Page Label: 4
Author: dsdparsons
Date: 11/9/2026 9:34:13 AM
Status:
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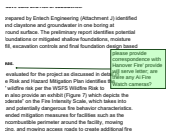
Add statement: 1This area of County where site is proposed is NOT anticipated to cause leapfrog development; residential and commercial development is not desirable at this location due to...
2Existing large scale utility providers exist and it is feasible that additional utility providers would settle in this area due to the existing power generation facilities producing energy for El Paso County residents/commercial businesses which is consistent with the character of the area..



Subject: Planner
Page Label: 5
Author: dsdparsons
Date: 11/9/2026 9:30:50 AM
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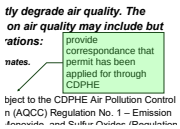
Add discussion on construction related impacts please. Please reference haul route and potential collateral development agreement to ensure any damage is corrected at applicants expense

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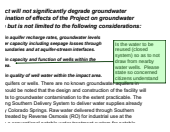
Subject: Planner
Page Label: 6
Author: dsdparsons
Date: 11/9/2026 9:22:49 AM
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please provide correspondence with Hanover Fire' provide will serve letter; are there any Ai Fire Watch cameras?



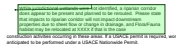
Subject: Planner
Page Label: 8
Author: dsdparsons
Date: 11/9/2026 9:21:58 AM
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provide correspondance that permit has been applied for through CDPHE



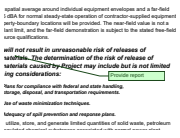
Subject: Planner
Page Label: 10
Author: dsdparsons
Date: 11/9/2026 9:29:14 AM
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Is the water to be reused (closed system) so as to not draw from nearby water wells. Please state so concerned citizens understand



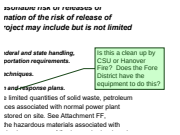
Subject: Planner
Page Label: 11
Author: dsdparsons
Date: 11/9/2026 9:25:30 AM
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While jurisdictional wetlands were not identified, a riparian corridor does appear to be present and planned to be rerouted. Please state that impacts to riparian corridor will not impact downstream properties due to sheet flow or change in drainage, and Flora/Fauna habitat may be relocated at XXXX if that is the case



Subject: Planner
Page Label: 12
Author: dsdparsons
Date: 11/9/2026 9:25:52 AM
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Provide report



Subject: Planner
Page Label: 12
Author: dsdparsons
Date: 11/9/2026 9:26:30 AM
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Is this a clean up by CSU or Hanover Fire? Does the Fore District have the equipment to do this?



Subject: Planner
Page Label: 15
Author: dsdparsons
Date: 11/9/2026 9:39:57 AM
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Please add that unincorporated residents and commercial users also benefit by CSU power