COLORADO
Parks and Wildlife
Department of Natural Resources

Southeast Region
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6 November 2026

Kari Parsons
El Paso County Planning & Community Development
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RE: CPW Comments on the Williams Creek Generating Station CSU 1041, El Paso County

Dear Kari Parsons,

Colorado Parks and Wildlife (CPW) appreciate the opportunity to comment on the Williams Creek Generating Station (the Project), to be developed by Colorado Springs Utilities (CSU) in El Paso County, Colorado. CPW staff are familiar with the location of the Project as well as the area surrounding the site. CPW comments include a summary of our statutory responsibility, understanding of the project, general recommendations, and recommendations to avoid or minimize adverse impacts to wildlife and wildlife resources within the Project area.

Laura Clellan, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: James 'Jay' Tutchton, Chair · Gabriel Otero, Vice-Chair
Jessica Beaulieu · Frances Silva Blayney · Tai Jacober · John Le Coq ·
Peter Maguire · Dallas May · Jack Murphy · Rebecca 'Becky' Niemiec · Richard Reading

CPW's Statutory Responsibility

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 and land use planning and development. 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, and 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. US Fish and Wildlife Service should be consulted on any Federally-listed Endangered and Threatened Species that might be present at the location.

Understanding of the Project

The proposed Project will be a 400-megawatt (MW) natural gas-powered generation facility located on a 206-acre parcel of land owned by the City of Colorado Springs. Other land use activities in the vicinity include multiple solar arrays, two electrical substations, the Southern Delivery System Williams Creek Pump Station and a section of the Southern Delivery System Raw Water Pipeline.

The Project will include ten natural gas units with state-of-the-art emission controls. Other improvements associated with the Project include water service infrastructure and a natural gas service line extension. Access to the site will be primarily from Squirrel Creek Road with secondary access from Birdsall Road via Old Pueblo Road. All construction hauling traffic will follow the Old Pueblo Road to Birdsall Road path, while additional construction crew passenger vehicle traffic will also use the Squirrel Creek Road access.

General Recommendations

CPW recommends that, when selecting sites for energy development, the developer focuses on options that avoid critical wildlife habitats over the use of mitigation strategies. If developers can consolidate facilities and roads to the extent possible, this will minimize the amount of land that is disturbed and fragmented. New transmission lines should follow existing transmission corridors and pre-disturbed areas, such as roads, whenever feasible, to minimize additional impacts on wildlife and habitat fragmentation. If there are multiple developments planned for an area, CPW recommends consideration of wildlife movements at a larger scale. Please refer to guidance for developers available at the CPW Energy and Land Use website. Early consultation between CPW and developers of energy projects is critical for avoiding impacts to sensitive species.

Potential Impacts To Wildlife Resources

High Priority Habitats (HPH) are sensitive areas identified using CPW's Species Activity Mapping (SAM) database, which incorporates scientific data and wildlife observations. These publicly available maps inform environmental assessments and planning. No HPH is mapped in the Project area.

Impact Avoidance, Minimization And/Or Mitigation Recommendations

Impact avoidance, minimization, and/or mitigation recommendations are based on CPW's Species Activity Mapping (SAM) database that includes HPH layers. If Project proponents would like to view Project area HPH, spatial data is publicly available at https://geodata.colorado.gov/maps/89680b8ea64b4aa090e8fb904528674b/about or https://codex.cnhp.colostate.edu/content/map .

Raptors and Migratory Birds

The Project is in the breeding range of golden eagle (*Aquila chrysaetos*), though no eagle nests are known in the area. CPW mapping data does not have recent nest records for raptors in the area; however, the CPW mapping data are not a complete census, and lack of data does not mean that raptor nests are not present.

To ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, CPW recommends consultation with USFWS. All migratory birds are protected under the Migratory Bird Treaty Act, and any removal or disturbance of an active migratory bird nest requires prior consultation with CPW and USFWS. Both active and potential nest sites, as well as winter night roosts, should be considered when evaluating potential disturbance during ground-disturbing activities.

CPW agrees with the recommendations in the wildlife report in the application items labelled “F. Correspondence with Colorado Parks and Wildlife and US Fish and Wildlife Service For Williams Creek Generating Station” that recommend ground-clearing take place outside of the nesting season for migratory birds (March 15 - July 31) or nest surveys should be conducted if ground disturbance cannot be avoided during nesting season so individual nests can be avoided. Preconstruction surveys also should be conducted to identify raptor nests within the Project area and CPW recommends adherence to the recommended buffer distances and timing stipulations identified in the CPW document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors," available on the CPW website.

Other CPW Recommendations

Wildlife Movement and Fencing

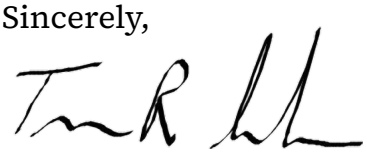
The Project location provides habitat to big game. CPW agrees with the wildlife report recommendation for wildlife-safe fencing as described in the CPW document "Fencing with Wildlife in Mind." Security fencing around the Project perimeter will prevent the movement of wildlife throughout the site and force wildlife species to spend more energy to move around the Project. While the Project site itself is not very large relative to neighboring solar facilities, it will be located in a space between arrays that are part of the Pike solar facility and will "plug" this open space between fenced arrays. This will result in about 3 miles north to south with just a few narrow unfenced east/west passages available to wildlife along Irradiance Rd. to the south of the project and an access road along the north. CPW requests that fences for this Project be set back from the solar

arrays to the north and south to allow for big game and other wildlife movement. Movement corridors should be at least 200-300 meters (656-984 feet) in width, and generally should be as wide, straight, and short as possible.

Closing

We appreciate the opportunity to comment on this solar and storage Project. As always, CPW staff are available to work with EDF on how best to minimize development impacts to both wildlife and their habitats. If you have questions or would like clarification about any of our comments, please contact District Wildlife Manager Philip Gurule at 719-828-4960 or philip.gurule@state.co.us or Renewable Energy Liaison Victoria Poulton at 719-661-7269 or victoria.poulton@state.co.us.

Sincerely,



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