

1041 Documents Related to 2.303 (Items 1-23)

For

Williams Creek Generating Station

Williams Creek Generating Station
El Paso County 1041 Application

Applicant: Colorado Spring Utilities

Colorado Springs Utilities
It's how we're all connected

Prepared by:

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Chapter 2, Article 3: Permit Applications
Section 2.303: Submission Requirements for all Permit Applications

(1) Completed Application Form

El Paso County 1041 Application is included as **Attachment A– 1041 Application Form**.

(2) Additional Information, as required by the Director

No additional information or documentation has been requested at this time.

(3) Certification of Deed of Mineral Owners and Notification of Mineral Owners of Surface Development

Please see **Attachment B– Certification of Notice to Mineral Estate Owners**. This verifies that the Applicant has researched the mineral estate owners and identified the list through the El Paso County Clerk and Recorder. If applicable, the Applicant will provide notice to any mineral rights owner of a hearing date more than 30 days prior to the hearing date and submit verification to the county.

(4) Information describing the applicant

(a) Names, Addresses, including email and fax, organizational form, and business of the applicant and, if different, the owner of the Project

The applicant is Colorado Springs Utilities (Springs Utilities), which is the largest community-owned, not-for-profit, four-service utility in the nation. For more than 100 years, Springs Utilities has provided Colorado Springs with safe, reliable and competitively priced electric, natural gas, water and wastewater services. They care about the community's well-being, support local business and have an interest in all things that help make Colorado Springs a great place to live, work and play.

Applicant:	Colorado Springs Utilities c/o: Mike Myers, General Manager 1521 Hancock Expressway Colorado Springs, CO 80903 Phone: 719.668.8766 Email: mmyers@csu.org
Organization Type:	a Colorado Municipal Utility
Project Owner:	Colorado Springs Utilities (Springs Utilities)
Address:	The project address will be determined during the site development plan review process.

(b) Names, Address, and Qualifications, including those Areas of Expertise and Experience with Projects Directly Related or Similar that Proposed in the Application, of Individuals who are or will be Responsible for Constructing and Operating the Project

ProEnergy

ProEnergy will be responsible for constructing the Williams Creek Generating Station. The current ProEnergy staff member responsible for overseeing the construction effort is Matthew Jarrett. Matthew is a Project Manager with ProEnergy, where he manages the full-lifecycle execution of power generation projects, coordinating engineering, procurement, construction, and commissioning activities from project development through commercial operation. Matthew has more than 18 years of project management and leadership experience in the power generation industry, including extensive experience managing large capital projects and nuclear power plant outages. He holds a B.S. in Construction Management from Sam Houston State University and has been a certified Project Management Professional (PMP) since 2012. Matthew has also completed graduate-level coursework in Organizational Leadership and Project Management at Northeastern University.

Springs Utilities

Springs Utilities will be the owner and operator of the proposed Williams Creek Generating Station. Current staff members responsible for operation of WCGS including the following:

Carl Holmgren – Carl is an Operations Supervisor and has been employed at Springs Utilities for 22 years, including 10 years as a power plant supervisor. Prior to becoming an Operations Supervisor Carl was first a Plant Systems Operator (PSO) where he worked 12-hours shifts with primary responsibility of in-field observation of power plant systems and chemistry. He then was promoted to Control Room Operator (CRO) where he was in charge of his assigned PSO for the shift and monitored equipment statuses, started and stopped equipment to ensure functionality and reliability of the power plant, and provided personnel training. Over his 22-year career with the organization, Carl was at primarily stationed at Front Range Power Plant which is a 500 MW 2x1 combined cycle power plant. Carl was also involved in the commissioning of the recently constructed power plant located in the downtown area of Colorado Springs and has provided operator training for that power plant.

Justin Jack – Justin has been employed at Springs Utilities for 17 years as a power plant operator and maintainer, and he is currently in his fourth year serving as the Power Plant Operations Superintendent for the organization. Prior to becoming the Operations Superintendent, Justin first worked in a hybrid position of mechanic and operator for remote energy plants. Remote energy plants, during Justin's tenure, consisted of a three (3) unit natural gas fired boiler generating plant, and six (6) hydroelectric turbines. He then was promoted to Operations Supervisor for remote energy plants where he was in charge of personnel training, safe operation guidance, personnel scheduling, prioritizing maintenance needs, and filled in as an operator during staff shortages. Given his exemplary performance as an Operations Supervisor, he was selected as the Operations Superintended in a competitive field of applicants and now oversees all operations of the organization's entire electric generation portfolio.

Oran Gonzales – Oran has been employed at Springs Utilities for nine years in the Mechanical Engineering - Operations Engineering Group with responsibility for supporting operations and maintenance activities for the organization's owned and operated electric generation portfolio which consists of simple cycle combustion turbines, hydroelectric units, coal-fired power, and a combined cycle plant where he has facilitated projects for major equipment overhaul or replacement, and supports daily operational troubleshooting needs. Notably, he served as the mechanical engineering lead and balance-of-plant construction superintendent for the installation of (x6) simple-cycle combustion turbine units located in the downtown area of Colorado Springs which are similar to the units that will be installed for the project. Oran has a Bachelor of Science degree in Mechanical Engineering from the University of Colorado – Colorado Springs and is a registered Professional Engineer (PE) in the State of Colorado.

(c) Authorization of application by Project Owner

Not Applicable. Springs Utilities is the Project Owner for the Williams Creek Generating Station.

(d) Documentation of the applicant's financial and technical capability to develop and operate the Project, including a description of the applicant's experience developing and operating similar Projects.

See Attachment P, Colorado Springs Utilities 2026 Annual Operating and Financial Plan. Most recently, Springs Utilities developed the aeroderivative plant at the former Martin Drake coal plant site downtown Colorado Springs. The facility achieved commercial operation in June 2023 and currently operates six aeroderivative generating units.

Front Range was built in 2003 as a joint venture with TIC with a 50/50 ownership with Colorado Springs Utilities operating the plant since 2004. Springs Utilities bought out TIC in 2011, it owns 100% of the plant and operates it today.

(e) Written qualifications of report preparers

The following consultant companies contributed to reports referenced herein:

Springs Utilities

Ashley Fritz - Ashley serves as the Owner's Representative and Project Manager and is responsible for overseeing the project from planning through construction and commissioning. With 20 years experience in the construction industry, Ashley has direct knowledge of the project's scope, site conditions, design, permitting requirements, schedule, and coordination with the various utility and project stakeholders. Her involvement in the project provides her with the technical and operational understanding necessary to accurately address the requirements of the 1041 permit and provide informed responses regarding the project's impacts and compliance. Ashley has a Bachelor's of Science degree in Construction Management from the Colorado State University and is a certified Project Management Professional (PMP).

Kevin S. Shrewsbury – Kevin participated in the preparation of this response document as well as several of the attachments specifically pertaining to federal, state, and Pikes Peak Area Council of Government regulations relative to the project. He is a certified environmental and Project Management Professional (PMP) with more than 15 years of experience supporting

utilities, infrastructure projects, environmental compliance, and regulatory permitting. As a Senior Environmental Specialist for Springs Utilities, he leads environmental permitting and compliance efforts for complex capital and operational projects and provides strategic guidance for capital projects and long-term resource planning.

Kevin has managed multidisciplinary projects involving environmental regulations, natural resources, air quality, industrial pretreatment, wetland mitigation, and long-term utility planning. He has worked extensively with federal, state, and local regulatory agencies and has successfully guided organizations through complex permitting and compliance challenges. Kevin's background includes environmental consulting, project leadership, construction oversight, and technical compliance management. He holds a Bachelor of Arts in Chemistry from The Colorado College.

Jenny Bishop – Jenny prepared all water rights and water resource documents in support of this application. Jenny is a Resource Planner IV in Water Resource Planning at Springs Utilities and is part of a team that plans for safe and reliable water supplies for Colorado Springs for the next fifty years. Jenny is also responsible for the Regional Water and Wastewater Services Program, a planning project to enable Springs Utilities to provide long-term water sustainability and wastewater treatment solutions for the benefit of the Pikes Peak Region. Jenny has been with the organization for more than 20 years, has a B.S. in Civil Engineering from the University of Dayton and is a licensed Professional Engineer. Jenny also holds a J.D. and MSEL from Vermont Law and Graduate School.

Kiewit

Daniel DuBose – Daniel serves as the Engineering Project Manager for Kiewit Engineering Group Inc., the Contractor for the project's supporting utility infrastructure. With more than 15 years of engineering, procurement, and project management experience across the energy and industrial sectors, he has direct knowledge of the project's scope, site conditions, design, permitting requirements, schedule, and coordination with the various utility and project stakeholders. His responsibility spans site work, water infrastructure, industrial wastewater infrastructure, and facilities. His involvement in the project provides him with the technical and operational understanding necessary to accurately address the requirements of the 1041 permit and provide informed responses regarding the project's impacts and compliance. Daniel has a Bachelor of Science degree in Industrial and Systems Engineering from Texas A&M University and is a certified Project Management Professional (PMP).

Vertex Consulting Services, LLC

Craig Dossey - The Letter of Intent, several exhibits, and this response document were prepared by Craig Dossey, President of Vertex Consulting Services LLC. Craig has worked in the land planning and entitlements field for over 20 years, including approximately 16 years in the El Paso County Planning and Community Development Department. He previously reviewed similar "1041 Permit" applications submitted to El Paso County as a planning reviewer and approved other 1041 Permits as the Permit Authority on Administratively Approved Permits as the Planning and Community Development Executive Director. Craig currently serves as President of Vertex Consulting Services, a Colorado Springs-based land planning and entitlements firm, which has prepared numerous land-use applications for review by El Paso County over the past five years. He has a Juris Doctorate and a Masters of Urban and Regional Planning.

Pikes Peak Forestry & Construction
The Fire Protection Report and Wildland Fire & Hazard Mitigation Plan are products of Michael Bukowski owner and operator of Pikes Peak Forestry & Construction and Red Rock Consulting Group, both based in Colorado. Michael has a Bachelor of Arts degree in Geography and Environmental Studies from University of Colorado with a focus in Physical Geography, and he holds several professional credentials relevant to this work, including: International Society of Arboriculture (ISA) Certified Arborist (RM-8273A), Pro-Board/IFSAC certified firefighter, NWCG certified wildland firefighter and wildland sawyer, and Nationally Registered EMT. His work combines forestry consulting, wildland fire mitigation planning, arboriculture, and emergency response experience. He regularly prepares wildfire mitigation plans and fire protection reports for development projects along the Front Range of Colorado, using Geographic Information Systems to assess fuel loads, defensible space, access, and fire behavior for Front Range terrain and vegetation. He is a fifth-generation Colorado native with a long-standing familiarity with the region's fire history and land patterns.

SM Rocha, LLC
The Traffic Impact Statement was prepared by Brandon Wilson, a senior traffic engineer at SM Rocha, LLC, which is a minority-owned business headquartered in Westminster and Colorado Springs, Colorado. Brandon has a BS in Civil Engineering Technology, minor in Mathematics, from the Metropolitan State University of Denver (MSU Denver). He is licensed as a Professional Engineer in the states of Colorado, New Mexico, and Wyoming, and is an active member of the Institute of Transportation Engineers (ITE) Colorado/Wyoming section.

Bristlecone Ecology
The environmental site surveys, noxious weed management plan, wetlands report, and Colorado Parks and Wildlife and U.S. Fish and Wildlife correspondence efforts were all produced by Bristlecone Ecology in support of the project.

Daniel Maynard – Daniel is the owner, founder, and principal ecologist of Bristlecone Ecology. He has nearly two decades of experience in environmental consulting, including extensive work in the land development and renewable energy industries. His expertise includes wildlife ecology; wetland science; natural resource assessments, planning, and management; environmental compliance and permitting at the state and federal levels; agency consultation; mitigation design and monitoring; and environmental impact assessments.

Daniel has extensive experience with state and federal environmental permitting and regulatory compliance, including Section 404 permitting under the Clean Water Act and Section 7 and Section 10 consultations under the Endangered Species Act. He also has experience coordinating 1041 permits at the county level in the State of Colorado. He leads all aspects of environmental projects from initial field assessments and natural resource evaluations through permitting, agency coordination, mitigation, and post-construction long-term monitoring. He has extensive experience consulting with federal, state, and local agencies, including the U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), U.S. Environmental Protection Agency (EPA), Colorado Department of Transportation (CDOT), Colorado Parks and Wildlife (CPW), El Paso County (EPC), and other municipal entities.

Emily DeAlto – Emily is an ecologist and naturalist. She has worked as an environmental

consultant with Bristlecone Ecology since 2022. Her responsibilities include GIS and mapping, technical report preparation, environmental permitting and compliance support, and coordination with clients, agencies, and project partners. She has experience in field surveys including identifying and assessing wetlands, vegetation communities, wildlife and wildlife habitat, and other natural resources across a range of ecosystems. She applies field observations and ecological data assessment to support project planning, permitting, and natural resource evaluations and prepares technical reports documenting the findings. Emily received her Master of Science degree in Plant Biology through the Field Naturalist Master's Program at the University of Vermont and her Bachelor of Science degree in Earth and Environmental Science from Lehigh University.

ME Engineers

Jeremy O'Brien – Jeremy is a senior principal and the office director of ME Engineers' Colorado Springs office. He is actively involved in the daily correspondence between clients and other trades and has experience in multiple aspects of construction administration, such as submittal and shop drawing review, site observations and field change requests. Jeremy has over 20 years of experience working on a wide variety of project types, including higher education and laboratory facilities, commercial buildings, government facilities, and residential buildings. Working closely with architects and contractors, Jeremy works to develop design solutions to meet the Owner's requirements.

Eric Eifealdt – Eric is an associate at ME Engineers with nearly 20 years of experience. His expertise includes power distribution system design, site utility coordination, lighting design, and lighting controls. Eric has worked on a variety of projects including higher education facilities, military facilities, commercial buildings, hotels, sports venues, and other large-scale projects. His responsibilities begin in the schematic design phase and carry through to construction administration.

(5) Information describing the Project

(a) Vicinity Map

See Attachment C, Vicinity Map, depicting the code requested 50-mile buffer around the project site. The project will also have two haul routes into the project site. These are depicted on Attachment E, Haul Route Map.

(b) Executive Summary of the project included scope and need

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

Is there an expansion of substation, transmission lines or carrier lines?

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.

(c) Plans and Specifications of the Project in sufficient detail to evaluate the application against the Applicable Review criteria.

Please see Attachment D 1041 Map Plan for a detailed project layout, resource maps, and relevant considerations to the proposed Project. The 1041 Map Plan identifies the planned use for the land and includes several supplemental attachments, existing infrastructure, and the overall siting envelope of the project.

Project and delivery method. The WCGS is proposed as a ten-unit, natural-gas-fired, simple-cycle generating facility using aeroderivative PE6000 combustion turbine generators. The facility will have an approximate nominal dispatchable capacity of 400 MW gross. The project includes the generating units and associated emissions-control equipment, fuel-gas systems, water-treatment and wastewater systems, electrical collection and transformation equipment, control systems, fire-protection systems, foundations, roads, grading, drainage and utility interconnections. The current general arrangement will be included or incorporated by reference as the controlled plans and specifications for the application. Design for this permit application has been advanced to the conceptual level.

Scope by package. Site work comprises grading for the entire site inclusive of the power plant, zero-liquid- discharge (ZLD) system, natural gas meter stations, detention pond and drainage infrastructure, paving improvements and access roads outside the power block, perimeter fencing and gates, and the gas supply tie-in between flange connection points furnished by others. Water infrastructure comprises of raw-water storage, a pump house with potable water treatment, and yard piping tying into the existing Southern Delivery System pipeline as the water supply source, a fire loop serving the control building, pump house, and zero liquid discharge building, potable water and plumbing, and a centralized onsite domestic wastewater treatment system. Industrial wastewater infrastructure comprises a ZLD system with a brine concentrator system, an equalization basin, and solar evaporation basins. Electric infrastructure comprises power distribution to auxiliary loads and the meter gates, an electrical power distribution center (E-House), the transmission interconnection, grounding, and distribution. Facilities comprise a control building with maintenance shop and warehouse, a guard shack, the ZLD building, signage, and alarms. Technology comprises the raceway, conduit pathways, and control system devices supporting networking and fiber infrastructure.

Principal equipment and throughputs. Raw-water storage totals 6.5 million gallons, supplied through a metered connection to the existing 66-inch Southern Delivery System pipeline and distributed by two raw-water pumps rated 1,440 gallons per minute each. Fire protection is

provided by one electric fire pump rated 2,500 gallons per minute with a jockey pump, backed by one diesel-powered emergency fire pump of the same rating. Potable water is produced by a treatment skid with a 10,000-gallon storage tank sized for a maximum assumed occupancy of ten facility personnel. The power plant processed water (i.e. industrial wastewater) is treated onsite by a ZLD facility, selected because the site has no proximity to existing wastewater infrastructure; its brine concentrator system comprises of two mechanical vapor recompression trains at 60% capacity each, evaporating water to produce a high-quality distillate for reuse, with capacity confirmed against the flow rate and water quality received from the power block. An equalization basin provides approximately 60 days of storage for power plant industrial processed wastewater ahead of treatment, and solar evaporation basins sized so that the net evaporation rate matches or exceeds the concentrated brine flow rate to provide storage and disposal for the concentrated brine. Domestic wastewater is treated by a centralized onsite wastewater treatment system. Site auxiliary power is distributed from an electrical power distribution center containing switchgear, motor control centers, dry-type step-down transformers, uninterruptible power supply, panels, and HVAC, with normal, emergency, and uninterruptible supplies sized to process load requirements and emergency loads made redundant.

Buildings, sizing, and intended use. The control building is an industrial operations facility of approximately 12,000 square feet inclusive of warehouse space, operating 24 hours a day and not open to the public. It contains a control room of approximately 600 square feet with multiple control desks including one redundant station for the ZLD facility, raised antistatic flooring, and at least one exterior wall facing the power plant with windows for visibility to the plant; a communications room of approximately 400 square feet housing racks and cabinets with dedicated climate control, dual power sources, uninterruptible power supply, and dry fire suppression; a maintenance shop of at least 2,500 square feet with a minimum clear ceiling height of twenty-four feet, an overhead rollup door, an overhead bridge crane, and crane access for turbine maintenance; warehouse space of at least 4,800 square feet designed for storage heights of 12 feet or less; one large office for two office spaces, open team workspace for five touchdown spaces and an enclosed, access-controlled engineering workspace for three to four workstations for dedicated systems with room for a maximum occupancy of 10 personnel; a conference room seating 10; a break room; restrooms with a shower and locker area; and a mechanical and electrical room. The building is fully sprinklered, served by a building automation system, and secured by cameras and access control. The guard shack is a 30 foot by 10 foot premanufactured structure at the site entrance, climate controlled, with a security workstation, windows facing front and sides, a kitchenette, a restroom, a communications equipment room, and a janitor closet, operating 24 hours a day. The ZLD building encloses the treatment equipment requiring indoor or climate-controlled installation and includes a restroom, safety showers, a lab room, office space for two, and a communications room. A climate-controlled communication room is also provided at the existing substation. Vertical dimensions for these structures are shown on the Elevation Views.

Codes, standards, and design parameters. Design conforms to the applicable requirements of the authorities having jurisdiction, including the American Water Works Association, the City of Fountain, the Colorado Department of Public Health and Environment, El Paso County, the Environmental Protection Agency, the Hanover Fire Protection District, the Hydraulic Institute, the National Fire Protection Association, OSHA, and the Pikes Peak Regional Building Department. Civil design complies with the most recent edition of ASCE 7 and, for drainage, with the El Paso County Engineering Criteria Manual, the Drainage Criteria Manual Volumes 1

and 2, and Mile High Flood District criteria. Buildings comply with the most recent International Building Code and all provisions stipulated by the Pikes Peak Regional Building Department, and steel structures follow the current American Institute of Steel Construction (AISC) Specification for Structural Steel Buildings. Geotechnical and seismic design follows Section 1613 of the 2021 International Building Code. Electrical equipment is designed, manufactured, tested, and installed to the latest applicable ANSI, IEEE, NEMA, and UL standards, with construction to the NEC and NESC. Mechanical system design and material selection follow ASME B31.1 Power Piping, and climate control design follows ASHRAE standards using local weather data. Instruments and their enclosures are rated for the process and environmental conditions in which they are installed, devices containing mercury or asbestos are prohibited, and process switches and transmitters monitoring critical variables are redundant in either a one-out-of-two or two-out-of-three arrangement. All equipment, systems, and subsystems are designed to a minimum 30 year working lifespan; all facilities are laid out to provide the space required to service, maintain, and operate the equipment; and redundancy is incorporated to reduce the need for system outages and support on-call and peaking generation. Site grading for the power plant produces a level pad with no more than one foot of grade deviation at an elevation of 5,450 feet. Design documents requiring professional signature and seal by a Professional Engineer registered in the State of Colorado.

Design and execution strategy. Design proceeds through defined submittal packages at different levels of design progression accompanied by internal design reviews. Existing conditions are established through record drawings, agency and utility provider mapping, and subsurface utility engineering, with utilities located by actual exposure where precise horizontal and vertical position is required and by surface geophysical methods elsewhere. Environmental compliance during design and construction is governed by specification sections addressing environmental procedures, permit requirements, environmental controls, and waste management and disposal, and all required environmental, access, and construction permits are secured, including floodplain, stormwater, county, and environmental permits.

Commissioning. Systems are commissioned progressively as they become mechanically and electrically complete. Pre-commissioning verifies installation completeness before power or water is introduced, with equipment alignment, valve orientation, and pressure testing confirmed, instrumentation calibrated, and alarms and interlocks verified at expected thresholds from both the control system and the field. Functional testing runs equipment dry and then with clean water to flush lines, test pressure, and check for leaks. Plant startup introduces untreated water progressively while adjusting flow rates and pressures toward target capacities, with continuous monitoring and laboratory testing of treated water quality, and performance verification runs the plant under various flow conditions.

(d) Description of alternatives to the Project considered by the Applicant.

Advanced modeling was done in 2021, evaluating multiple pathways to meet growing electric demand in Colorado Springs. A "No New Fossil Fuel" scenario was conducted which required three times higher nameplate capacity to serve the city. Three different sites were evaluated. The first site was the Horizon Utility Campus near the Colorado Springs Airport. This site is owned by the City, has an existing substation and potable city water nearby and required new gas and wastewater infrastructure. Although that was designed into the project and coordinated with other projects in the City, the Development Plan was not completed due to potential conflicts with airport operations that were unable to be fully mitigated without relocating the

project. The third site presented challenges with water and wastewater infrastructure as well. However, it was later deemed not feasible due to existing permitting. WCGS was the second choice; land is owned by the City, has existing substation infrastructure and Southern Delivery System water line runs through the project boundary.

(e) Schedules for designing, permitting, constructing, and operating the Project, including the estimated life of the Project.

Project development includes design, permitting, procurement, construction, commissioning, and completion. The project team has established the following planned milestones: civil work start September 2027, construction start supporting power plant infrastructure February 2028, power plant site mobilization on April 1, 2028; final Combustion Turbine Generator (CTG) foundation completion on September 1, 2028; final-unit major-equipment assembly completion on December 16, 2029; mechanical completion on January 15, 2030; final-unit readiness for first fire on February 27, 2030; substantial completion on May 15, 2030; and final completion on July 14, 2030.

Owner permits for permanent-construction access are targeted for March 4, 2028, construction utilities for April 1, 2028, permanent utility tie-ins for December 16, 2029, and potable water, natural gas, high-voltage power and communications availability for January 4, 2030.

(f) The need for the Project, including a discussion of alternatives to the Project that were considered and rejected; existing/proposed facilities that perform the same or related function; and population projections or growth trends that form the basis of demand projections justifying the Project.

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' 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 alternatives that were considered compared to siting the plant at the Williams Creek location have been discussed above in the response to Section 2.303(5)(d).

(g) Description of relevant conservation techniques to be used in construction and operation of the Project.

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.

(h) Description of demands that this project expects to meet and basis of those demands

Please see the response above to Section 2.303(5)(f).

(i) Adjacent Property Owners

The following list includes the property owners of land adjacent to the site:

Table 1: Adjacent Property Owners

Parcel No.	Owner
5600000137	Woodmoor Water & Sanitation District
5600000158	Woodmoor Water & Sanitation District
5600000183	Corundum Properties V LLC
5600000140	City of Colorado Springs
4600000041	City of Colorado Springs
5600000185	City of Colorado Springs
4600000046	State of Colorado
5600000030	State of Colorado
5600000029	Hanna Ranches Inc

(6) <u>Property rights, other permits and approvals</u>

(a) Description of property rights that are necessary or that will be affected by the Project, including easements and property rights proposed to be acquired through negotiation or condemnation

Outside of owning the 3,700 acres where the generating station will reside, Springs Utilities is actively engaged with Woodmoor Water and Sanitation District, which owns the adjacent parcel to the west of the subject site, and expanding a current access easement for operations of the existing substation and pump station to include road improvements for the duration of construction and operations of the power plant. The agreement includes improvements to the road to mitigate dust, ease traffic in and out of the property and will be limited to construction hauling only.

(b) A list of all other federal, state, and local permits and approvals that will be required for the Project, together with any proposal for coordinating these approvals with the County permitting process. Copies of any permits or approvals related to the Project that have been granted.

See below for a table identifying the applicable federal, state, and local permits and approvals required for the project:

Permit Name	Issuing/Approval Authority
APCD APEN / Construction Permit - Fuel and Storage	Colorado Department of Public Health and Environment
APCD APEN / Construction Permit - Stationary Source	Colorado Department of Public Health and Environment
APCD APEN / Title IV Acid Rain Permit	Colorado Department of Public Health and Environment
APCD APEN / Title V Federal Operating Permit	Colorado Department of Public Health and Environment
APCD Land Development Permit / APEN > 6 months and > 1 acre	Colorado Department of Public Health and Environment
Bird/Nest Clearance	Colorado Parks and Wildlife
CDLE - OPS Tank Installation Permit and Registration	Colorado Department of Labor and Employment
CDOT Oversized Weight Permit	Colorado Department of Transportation

Certificate of Designation (CD) Engineering Design and Operations plan (EDOP)	Colorado Department of Public Health and Environment
EDOP Construction Quality Assurance and Certification Reports	Colorado Department of Public Health and Environment
El Paso County - Grading and Erosion Control Permit	El Paso County
El Paso County 1041 Permit	El Paso County
El Paso County Construction Permit	El Paso County
El Paso County Development Plan	El Paso County
El Paso County Onsite Wastewater Treatment System Permit	El Paso County
EPA Acid Rain Permit	Environmental Protection Agency
FAA Determination of No Hazard	Federal Aviation Administration
Industrial Pretreatment (IPT) Discharge Permit	Colorado Department of Public Health and Environment
Industrial Pretreatment Special Discharge Request Approval	Colorado Department of Public Health and Environment
NPDES - Impoundment Waiver	Colorado Department of Public Health and Environment
Oil Pollution Prevention Regulations - SPCC Plan	Environmental Protection Agency
Phase I Assessment	NA
PPRBD Addressing Assignment	Pikes Peak Regional Building Department
PPRBD Building Permit	Pikes Peak Regional Building Department
SHPO Cultural Resource Consultation	State Historic Preservation Office
Soil and/or Groundwater Quality Evaluation	Colorado Geological Survey
T&E DOW/USFWS Consultation	United States Fish and Wildlife
Waste Management Plan (WMP)	Colorado Department of Public Health and Environment
Wetland Delineation Survey	United States Army Corps of Engineers
WOTUS ACOE Consultation	United States Army Corps of Engineers

WQCD Discharge of Dredged and Fill Materials into State Waters	Colorado Department of Public Health and Environment
WQCD Discharge of Stormwater Associated with Construction (NPDES)	Colorado Department of Public Health and Environment
WQCD Discharges Associated with Hydrostatically Testing of Pipelines, Tanks, and Similar Vessels (HT) Permit	Colorado Department of Public Health and Environment
WQCD Discharges from Short-Term Remediation [Dewatering] Discharge Activities	Colorado Department of Public Health and Environment
WQCD Short-Term Construction Dewatering (CDW) General Permit	Colorado Department of Public Health and Environment
WQCD Specified Area 7 Additional Sample Data Request	Colorado Department of Public Health and Environment

(c) Copies of relevant official federal and state consultation correspondence prepared for the Project; a description of all mitigation required by federal, state, and local authorities; and copies of any draft or final environmental assessments or impact statements required for the Project.

See Attachment F for correspondence between the project's environmental consultant, Bristlecone Ecology, Colorado Parks and Wildlife and the US Fish and Wildlife Service.

(7) <u>Land-Use</u>

(a) Project Map Detailing Current Land Use and Zoning, including adjacent lands

The Project area is currently zoned RR-5 (Residential Rural) with the WSE-O (Wind and/or Solar Energy Generation Overlay). Please see Attachment G, Zoning and Existing Conditions Map for details.

All of the properties adjacent to the Project area are also zoned RR-5 and those located to the north and east also include the WSE-O (Wind and/or Solar Energy Generation Overlay).

Attachment H, Public Lands and Land Use Map, includes the land use of the project site and directly adjacent lands as well as a map of the public lands depicted surrounding the site.

(b) Depiction and description of potential impacts of the proposed development upon public lands

There are no federally owned lands in the Project vicinity. State lands have been identified; however, they are not considered "public lands" because they have specific beneficiaries outside of the general public. These are depicted on Attachment H, Public Lands and Land Use Map. Attachment H identifies the boundaries of unincorporated City of Colorado Springs-owned lands, another map showing the land use and a third map identifying the public lands as a reference

point. Additionally, there are lands owned by the City of Fountain for the landfill and lands owned by the State that have been earmarked for the Kane Ranch Open Space Parks.

(c) Conformity to the El Paso County Master Plan

Your El Paso County Master Plan Analysis

Chapter 1 of Your El Paso Master Plan (2021) states that the Plan is "general in nature-it cannot tackle every issue in sufficient detail to determine every type of necessary action." In addition, Chapter 1 goes on to state that the Plan "is intended to provide clearer and more coordinated policy, resulting in a document that effectively communicates County goals and identifies specific actions to achieve both County-wide and local area objectives." When taken together, these two statements suggest to the reader that the Plan may only address certain issues at a cursory level and that specific steps or actions for addressing such issues may not be offered within the Plan.

Chapter 3 Land Use

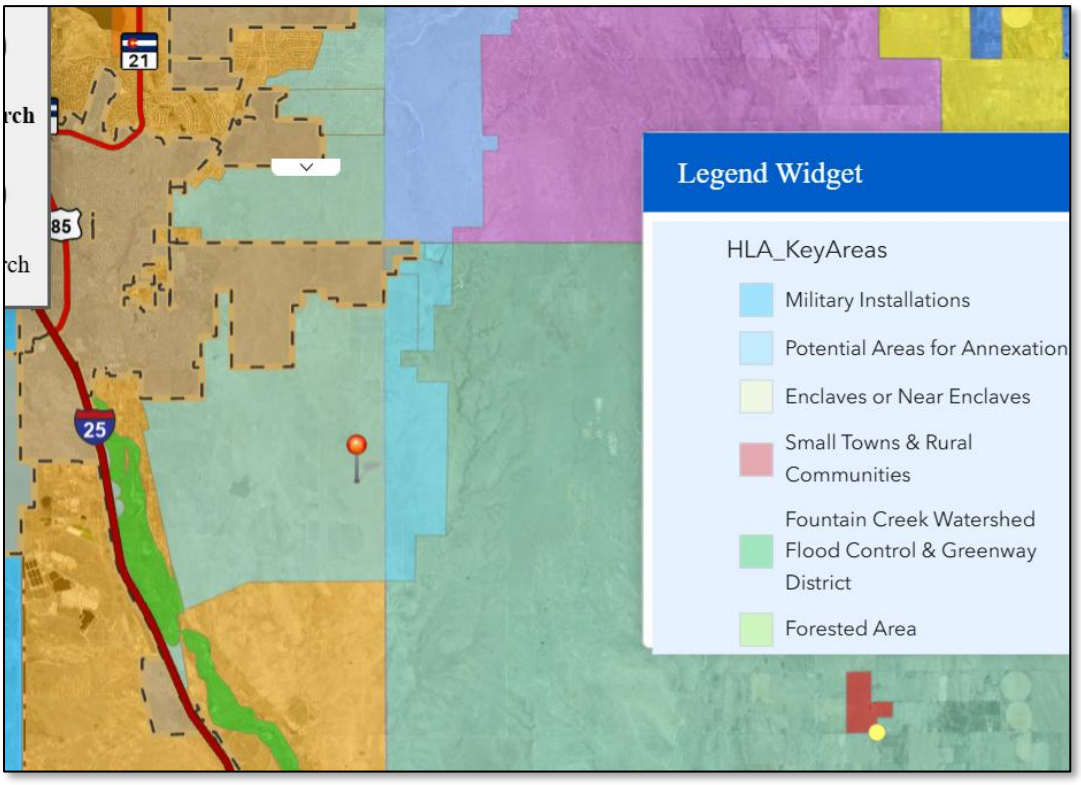
Key Area Analysis

The property is within the "Potential Areas for Annexation" Key Area of the Plan, which is likely due to the relative proximity to the City of Fountain incorporated boundaries. This Key Area is largely pertinent to new development requiring municipal services, such as centralized water and wastewater services, as well as extension of electrical and natural gas service infrastructure. The City of Fountain currently has little to no water service capacity to annex new development and is not proposed to provide any municipal services to the WCGS.

Water service to the site will be provided via Springs Utilities' existing Southern Delivery System pipeline, which extends through the site. Wastewater service for the onsite operations building will be provided via a new Onsite Wastewater Treatment System (OWTS). Electrical service will be provided by Mountain View Electric Association, if MVEA has adequate capacity to serve the site, or, alternatively, by Springs Utilities.

For these reasons, annexation of the property into the City of Fountain is not being requested nor would it be practicable due to the fact that the proposed "development" is limited to utility infrastructure and because all services necessary to adequately serve the project are already available.

Key Areas Map

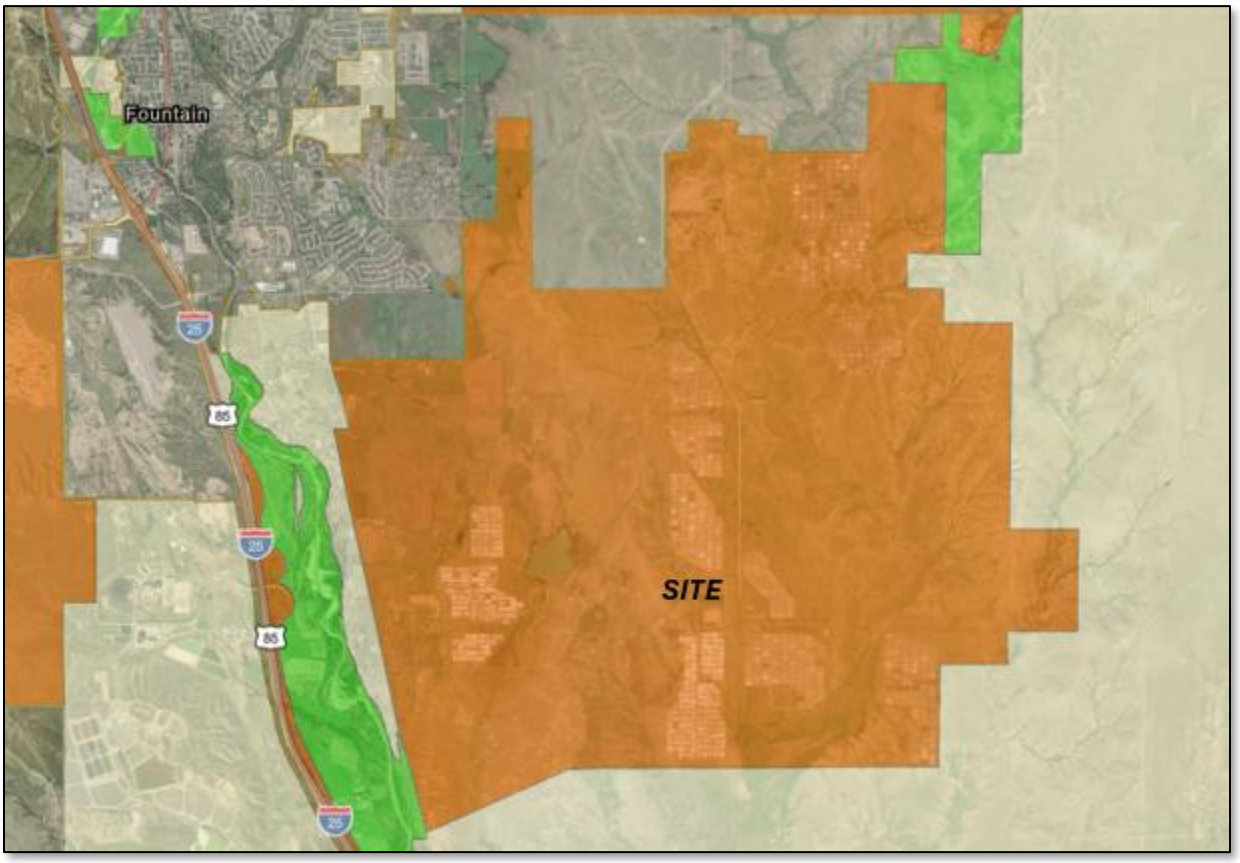


Area of Change Analysis

The property is identified in the Areas of Change map as within the "New Development" Area of Change. Page 21 of the Plan characterizes areas of "New Development" by stating:

> "These areas will be significantly transformed as new development takes place on lands currently largely designated as undeveloped or agricultural areas. Undeveloped portions of the County that are adjacent to a built out area will be developed to match the character of that adjacent development or to a different supporting or otherwise complementary one such as an employment hub or business park adjacent to an urban neighborhood."

Area of Change Map



The “New Development” designation of the subject property is already somewhat outdated due to the existing electrical substation on site. A similar conclusion can also be drawn when evaluating the land around the site, which are also included in the “New Development” designation, due to the presence of multiple solar energy generation facilities and associated utility infrastructure. Most solar arrays in this area are designed, constructed, and operated to provide solar generated energy pursuant to the specific terms of a power purchase agreement. These agreements typically extend over the course of a 30-year term but are often extended beyond the initial term. This means that the neighboring solar energy generation arrays and associated collection and transmission infrastructure are likely to remain in place adjacent to the proposed WCGS for the foreseeable future. As such, “New Development” in the form of residential or commercial growth is not likely to occur on the site or on most, if not all, of the adjacent parcels.

Placetype Analysis

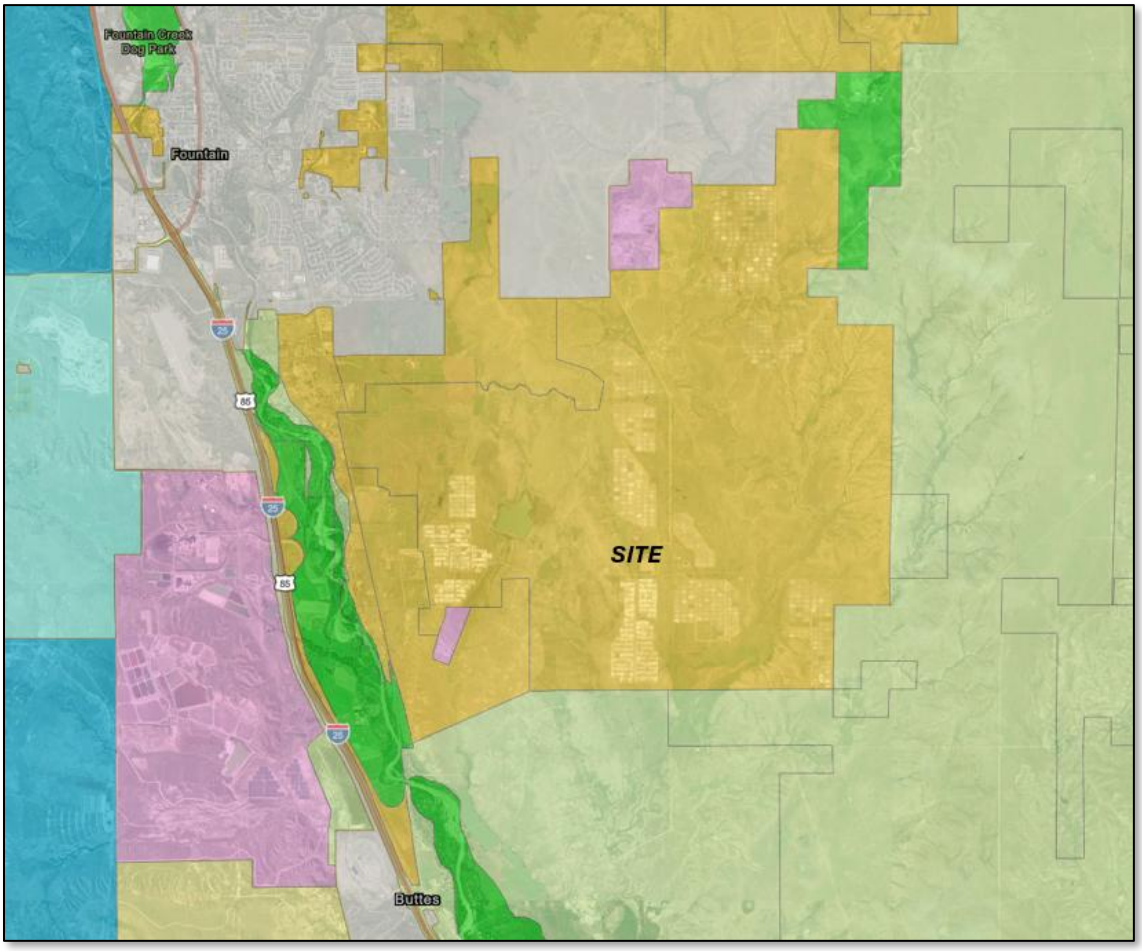
The subject property is shown on the Placetypes map of Your El Paso Master Plan as being within the Suburban Residential Placetype. Page 28 of the Plan identifies the following land uses as being Primary Land Uses within the Suburban Residential Placetype:

- Single-family Detached Residential with lots sizes smaller than 2.5 acres per lot, up to 5 units per acre

In addition, the Placetype includes the following Supporting Land Uses:

- Single-Family Attached
- Multifamily Residential
- Parks/Open Space
- Commercial Retail
- Commercial Service
- Institutional

Placetype Map



The Suburban Residential Placetype is described further on page 28 as follows:
“Although primarily a residential area, this placetype includes limited retail and service uses, typically located at major intersections or along perimeter streets. Utilities, such as water and wastewater services are consolidated and shared by clusters of development, dependent on the subdivision or area of the County.”

Major utility facilities, such as the existing Pike Solar Array facilities and the proposed WCGS, are not specifically listed as either primary or supporting land uses within the Suburban Residential Placetype.

It is important to note, however, that Chapter 14, Implementation, of the County' Master Plan provides specific "Guidance for Evaluating Land Use Applications" including stating that:

> "Some requests may include a proposed use that was not identified or otherwise anticipated within the respective Master Plan Placetype. ***In this instance, the proposal should not be immediately discounted as inconsistent with the Master Plan***, but instead should be evaluated based upon the merits of the proposal for overall consistency with the Plan, compatibility with the surrounding land uses, and whether the use supports the overall character of the area." (p. 143) (emphasis added)

In adopting the Master Plan, the County understood that predicting the type and appropriate location of some land uses is very challenging. Page 143 of the Plan states that:

> "Recognizing that it is impossible to foresee or forecast all future land use or development requests and given the unpredictable nature of land use requests, this Plan was written with the intention of remaining open and flexible. Moving forward, while using the Master Plan as a foundational guide for decision-making, it will be the role of County officials to implement the Plan by making decisions on land use requests in a manner that best fits the needs and vision of El Paso County."

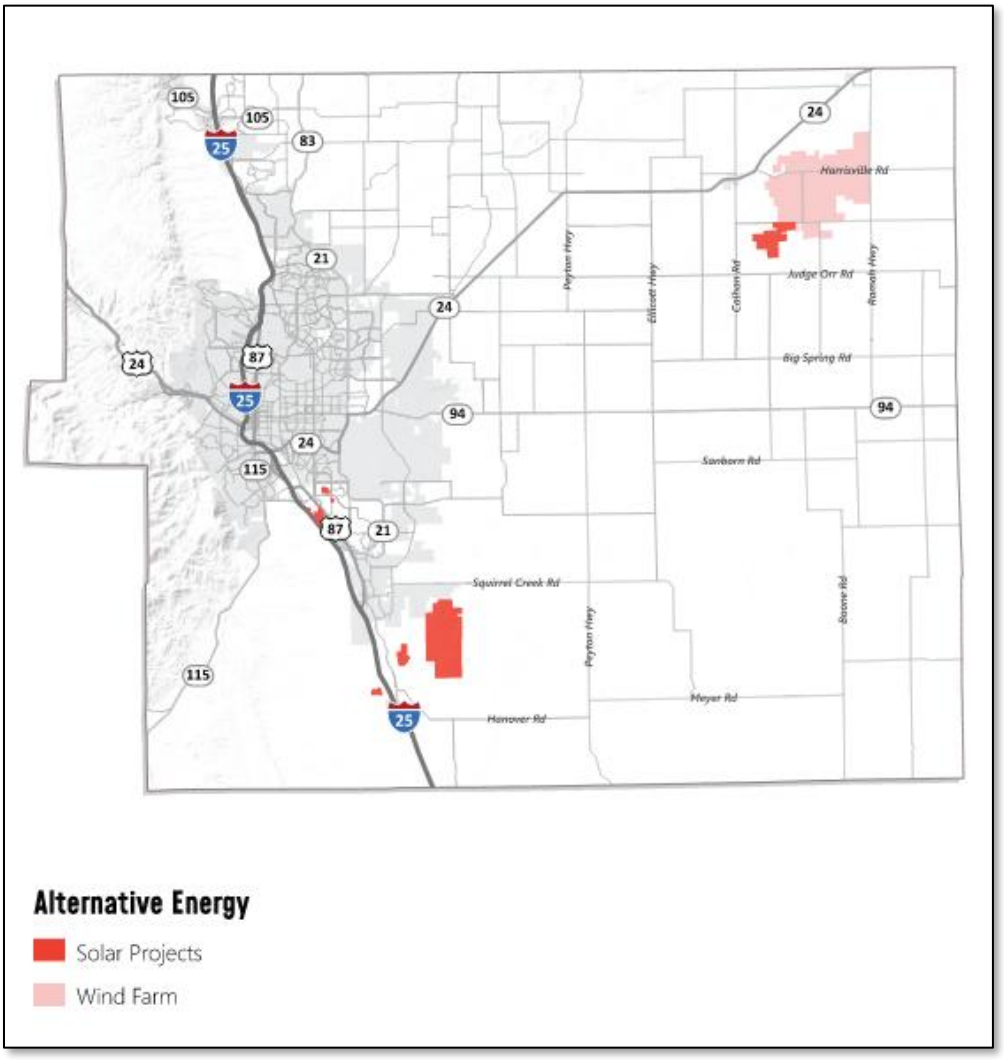
The guidance provided by the County on page 143 of the Plan includes the idea that even though a land use may not be specifically identified in the Plan, that same land use "should not be immediately discounted as inconsistent with the Master Plan, but instead should be evaluated based upon the merits of the proposal for the overall consistency with the Plan, compatibility with the surround land uses, and whether the use supports the overall character of the area." The County goes on to expand upon with idea of flexible application of the Plan by asserting that "the County should remain open-minded and adaptable to 'one-off' uses, which may include necessary but locally questionable uses."

The immediate adjacency of existing solar energy generation facilities and the existing Southern Delivery System Pump Station and Raw Water Supply Pipeline indicates a change in the area beyond the Suburban Residential Placetype designation. Each of the existing land uses on the site and on adjacent properties is utility in nature and are directly compatible with the proposed WCGS. The proposed power plant, like the existing solar arrays and associated electrical substation, are located at a significant distance from all existing residential land uses and are located on large-acreage parcels, allowing for increased setbacks from the utility facilities.

Chapter 8 Infrastructure

Chapter 8 of Your El Paso Master Plan provides significant guidance for the County and the community as a whole on the importance of planning for and providing utility infrastructure. More specifically, the Plan states, "Providing modern infrastructure, utilities, and services to El Paso County residents helps ensure they have a high quality of life." (p. 96) The Plan addresses each of the electric service providers in the County on p. 107, and in reference to Springs Utilities it states:

"Areas within the City of Colorado Springs are powered by Colorado Springs Utilities (CSU). The military installations of Fort Carson, Peterson AFB, and the United States Air Force Academy (USAFA) receive electric service from CSU as well. CSU also provides power to the cities of Manitou Springs, Green Mountain Falls, and Chipeta Park. CSU coordinates its transmission planning with other transmission providers and stakeholders in the CCPG subregion and in the Western Interconnection as a whole. ***The CSU board has approved a plan for a new energy future that is cost-effective, resilient and environmentally sustainable***." (emphasis added)



The proposed WCGS is part of Springs Utilities' "plan for a new energy future" that will help deliver cost-effective energy to significant parts of the County, including three military installations as well as incorporated and unincorporated developed areas in and around the City of Colorado Springs. By characterizing the future plans of Springs Utilities as "resilient and environmentally sustainable" and in mapping the solar energy generation facilities around the proposed WCGS location as depicted on p. 108 and provided above, the Plan has established that energy generation infrastructure is not only necessary for sustainable growth in the County but that its location, particularly in this area of the County, is acceptable.

El Paso County Water Master Plan

The Executive Summary from the Water Master Plan (2018) states, “The Water Master Plan (WMP) was developed for the Board of County Commissioners, El Paso County officials and staff, developers, citizens, and water providers within the County for the purpose of identifying and addressing water supply issues earlier in the land use entitlement process.” The Plan provides an analysis of water supply for central water providers throughout El Paso County on a Planning Region basis. The subject property is located within Planning Regions 6 and 7 of the Water Master Plan, pursuant to Figure 3-1 on page 25. Region 6 includes only two small mobile home park water providers. Region 7 includes a number of central water providers, but the City of Fountain is the only provider within relative proximity to the property. As discussed above, annexation of the property into the City of Fountain is not practicable at this time. Development of the site does not require annexation into the City of Fountain nor does it require extension of services lines from an existing provider identified in Region 7; therefore, an analysis of the projected Region 6 demands and supplies would not be applicable. Instead, water service will be provided via a new service line from the existing onsite Southern Delivery System raw-water pipeline. Springs Utilities is the primary water service provider in Region 1, which is identified in the Water Master Plan has having a current water supply surplus of 15,379 acre-feet and a projected water supply need in years 2040 and 2060 of 12,085 and 39,452 acre-feet. These projections do not take into account the development of existing water rights owned by Springs Utilities or any additional water rights acquired in the future. Onsite treatment of the raw-water supplies will be provided for domestic use.

El Paso County Parks Master Plan

The El Paso County Parks Master Plan (2022) does not depict any planned or existing trails or open space on the subject property. The nearest proposed trails are the Kane Ranch Primary Regional Trail and the Great Plains Primary Regional Trail as depicted in Attachment I, Trails Master Plan Exhibit. Neither proposed trail alignment is located on the subject parcel; therefore, no parks or trails improvements or dedications are being proposed with this application.

2024 Major Transportation Corridors Plan (MTCP)

All passenger vehicle access to the site is from Squirrel Creek Road, which is currently a Rural Major Collector roadway and is planned in the El Paso County Major Transportation Corridors Plan 2040 Functional Classification map as a Minor Arterial Roadway. Map 6, Existing Capacity Analysis, on page 36 and Map 10, 2040 Capacity Analysis, of the MTCP both depict Squirrel Creek Road as being an “Uncongested” roadway. Traffic generation from the ongoing operation of the site will be minimal and generally limited to functions performed by utility and maintenance personnel. For this reason, no transportation capacity improvements are proposed or required.

Other Topical Elements of the County Master Plan

The proposed project is in compliance with the other topical elements of the County Master Plan, including the Master Plan for Mineral Extraction, and the El Paso County Wildlife Habitat Maps and Descriptors.

(d) Conformity to applicable regional and state planning policies

Water Quality Regulations / Requirements

The Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division (WQCD) administers Colorado's potable water and domestic wastewater regulations under Water Quality Control Commission (WQCC) Regulations No. 11- Colorado Primary Drinking Water Regulations (Regulation 11), No. 22 - Site Location and Design Regulations for Domestic Wastewater Treatment Works (Regulation 22), and No. 43 - On-site Wastewater Treatment System Regulation (Regulation 43). The following sections detail the applicability of these regulations to the Williams Creek Generating Station (WCGS) potable and wastewater treatment systems.

Potable Water System

The WCGS potable water system will only serve WCGS personnel, have fewer than 15vservice connections, and will not regularly serve an average of at least 25 individuals per day for 60 or more days per year. Therefore, the system does not meet the definition of a Public Water System under Regulation 11 and is not subject to the CDPHE Drinking Water Program design approval requirements.

Wastewater Treatment System

The WCGS will process industrial wastewater using a ZLD system and sanitary wastewater through an On-site Wastewater Treatment System (OWTS).

Industrial wastewater will be managed entirely on-site through the ZLD system and will not be discharged to a Domestic Wastewater Treatment Works. Therefore, the project is not subject to Regulation 22 or the Regional 208 Plan and does not require site location approval from CDPHE or PPACG.

The OWTS will only manage sanitary wastewater generated on-site and will have a design flow not exceeding 2,000 gallons per day. Accordingly, the system does not meet the definition of a Domestic Wastewater Treatment Works under Regulation 22 and is regulated as an OWTS under Regulation 43, which is administered by local public health agencies. The OWTS will be designed, permitted, constructed, and operated in accordance with Regulation 43 and subject to El Paso County Public Health Department’s permitting requirements.

Air Quality Regulations / Requirements

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.

The following sections detail the applicability of air quality regulations to the WCGS as of August

2026.

AQCC Regulation 1

The emission sources at the WCGS will comply with the requirements provided in Section II.A.1 and 2, as follows:

- Compliance with Regulation 1 is presumed for the 10 combustion turbines based on use of natural gas as fuel; and
- Springs Utilities proposes to conduct an annual Method 9 observation for the ULSD-fired black start emergency engine if it operates within the calendar year.

AQCC Regulation 2

The facility is subject to facilities located in areas not used predominantly for residential or commercial purposes, whereas it is a violation if odors are detected after the odorous air has been diluted with 15 or more volumes of odor free air. Consistent with Regulation 2 Section I. C. 1, the facility is required to have an affirmative defense to violations of Section I. B. of the regulation.

AQCC Regulation 3

The State of Colorado has been granted authority to implement and enforce the permitting requirements specified by the federal Clean Air Act. The general requirements for permits and permit revisions are codified under Regulation 3. The proposed facility has Potential to Emit (PTE) for each regulated pollutant below the major source thresholds of 250 tons per year (tpy) each. As such, the facility will be a minor source as defined in 40 CFR Part 52.21(b)(4) incorporated in Regulation 3. Review under Prevention of Significant Deterioration (PSD) regulations is not required.

As provided in 40 CFR Part 70.3, the WCGS will be subject to the Title V Operating Permits program as implemented in Regulation 3, Part C and Part D.

As required by Regulation 3, Part B III. B. 5, Springs Utilities submitted an Environmental Justice (EJ) Summary on September 3, 2026, and received a letter of concurrence on September 15, 2026. As of August 2026, the facility is located in a Disproportionately Impacted Community that meets the definition of a Socioeconomically Vulnerable (SV) Community. Table 2 of Regulation 3, Part B III. J. 3 outlines the Community Monitoring fees that will be applicable to the facility as it is in a SV Community and will emit affected pollutants at a rate greater than or equal to the affected construction source threshold. This fee will be a one-time fee of $200 per affected pollutant above the affected construction source threshold. The facility's emissions are expected to be above the significant emission threshold for VOC, NOX and PM2.5. A $600 Community Monitoring Fee will be paid to the Stationary Source Control Fund.

Air dispersion modeling is being performed to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and the Colorado Ambient Air Quality Standards (CAAQS). Air dispersion modeling determinations and corresponding files are submitted directly to the APCD Dispersion Modeling Unit (DMU).

The EJ analysis, CDPHE EJ letter of concurrence, APCD Construction Permit application, and DMU modeling determination will be provided to El Paso County Planning Department upon completion.

AQCC Regulation 15
The facility will comply, if and as applicable, with the requirements stipulated in Regulation 15, including the standards, criteria, and requirements set forth in 40 CFR Part 82, Subpart F.

AQCC Regulation 26
The WCGS is located in an attainment/unclassifiable area, is not a major stationary source of HAPs, and the diesel-fired emergency black start engine's annual operation will be limited to 249 hours/year. Therefore, the stationary sources located at the WCGS are not subject to requirements of Regulation 26.

(e) Conformity to federal land management policies

Federal land management plans or policies do not apply to this Project. The Project will be developed on land owned by the City of Colorado Springs on behalf of its enterprise Springs Utilities. The project will abide by regulations set forth by various federal agencies including US Army Corps of Engineers and will obtain input on the Project details during the review process.

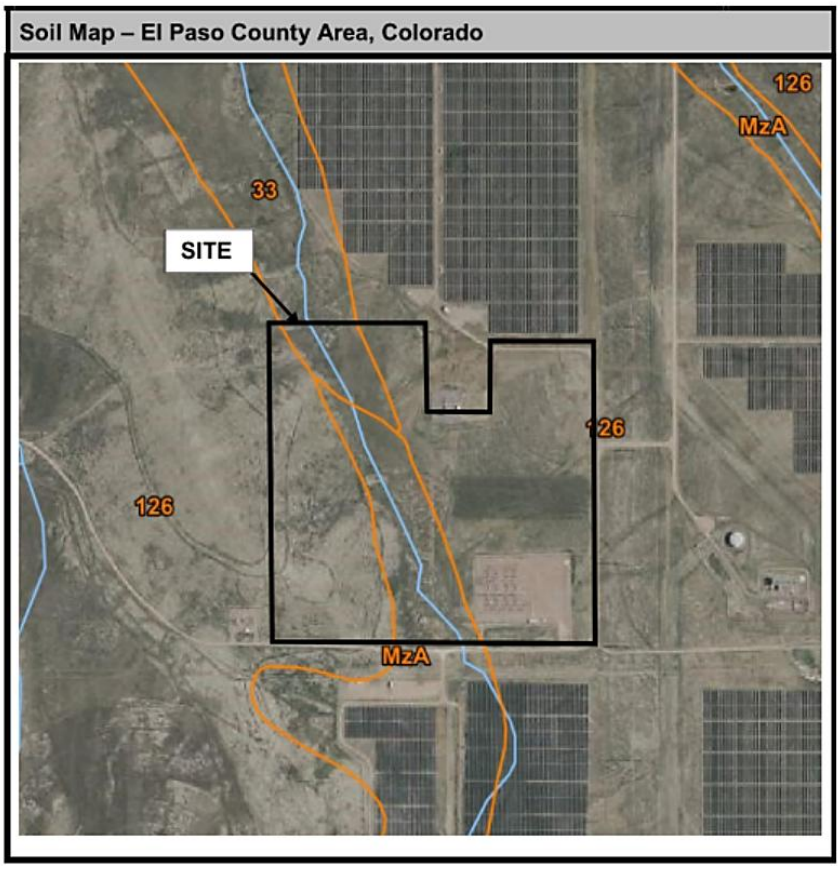
(f) If relevant to Project Design, describe the agricultural productivity capability of land in the Project area, using Soils Conservation Service classification data.

Attachment J, Soils and Geology Report prepared by Entech Engineering, references soil mapping by the Natural Resource Conservation Service (NRCS) in identifying that property contains soils having clay loam and silty clay loam (see Exhibits 2 and 3 from Attachment J below). The land is currently vacant historic rangeland used for grazing. There is a portion of the land currently zoned as A-35 (Agricultural); however, the land and associated soils do not provide the best characteristics as farmland. The identified soil types are typically very good for water retention and essential plant nutrient storage; however, they also present substandard draining characteristics and high potential for creating a concrete-hard surface crust making it difficult to till and challenging for meaningful root growth.

Exhibit 2: Soil Survey Descriptions

Type	Description
33	Heldt clay loam, 0% to 3% slopes
126	Midway clay loam, 1% to 15% slopes
MzA	Manzanola silty clay loam, saline, 0% to 2% slopes

Exhibit 3: USDA – Web Soil Survey



(g) Describe probability that the Project may be significantly affected by earthquakes, floods, fires, snow, slides, avalanches, rockslides, or landslides and any measures taken to reduce impacts

Earthquake Potential

The project will be designed to withstand the natural hazards reasonably anticipated at the site. Structural design 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. The aquatic-resources report includes FEMA one-percent-annual-chance flood-hazard mapping; final grading and facility limits must be checked against that mapping and site-specific drainage analysis. Entech identifies potential Site Class C or D pending additional investigation; the final structural criteria must reconcile this with the A-1 preliminary assumptions. Project grading and drainage will convey runoff through designed drainage facilities and account for Williams Creek and the mapped ephemeral drainages. Fire-protection and severe-weather measures will be incorporated into final design and emergency procedures. Site-specific drainage, wildfire and final geotechnical recommendations will be used to confirm the final hazard determination.

Flooding Potential

The probability that the WCGS will be significantly affected by flooding is low. The site lies within Zone X, an Area of Minimal Flood Hazard, as mapped on FEMA Flood Insurance Rate Map panel 08041C0970G, and no regulatory floodway and no Special Flood Hazard Area affects any part of the Project. The Project is, therefore, not exposed to riverine flooding from a mapped source. The flood risk that does exist is the ordinary risk of stormwater runoff concentrating on and around a developed site.

That risk is managed by the stormwater system analyzed in Attachment K, Preliminary Drainage Report, which has been submitted with this application. An unnamed intermittent tributary of Williams Creek crosses the site and is carried through the development in engineered bypass channels that maintain its historic flow path while keeping Project infrastructure clear of the conveyance. Runoff from developed areas is collected in a private storm sewer network and routed to two full-spectrum detention basins, one serving the power block and one serving the gate station, which provide water quality capture volume, excess urban runoff volume, and one hundred-year peak flow attenuation before discharging to the existing tributary channel at rates meeting the County's historic release requirements. Each basin includes a multi-stage outlet structure, an emergency spillway sized to pass the uncontrolled 100-year flow, and a minimum of two feet of freeboard above the100-year water surface elevation. The system is designed to El Paso County Engineering Criteria Manual, Drainage Criteria Manual, and Mile High Flood District criteria.

Fire Potential

Attachment L, Springs Utilities WCGS Wildland Fire Risk and Hazard Mitigation Plan, prepared by Micheal Bukowski, BA GES, with Pikes Peak Forestry & Construction, provides a wildfire risk assessment beginning on page 8 of the Plan. Specifically, the Plan cites the USFS Wildfire Risk to Communities Program map, in identifying a “Moderate” wildfire risk potential for the site. Michael identifies that this rating is based on “the likelihood of wildfire occurrence and the expected intensity if a wildfire occurs.” The Plan also cites the Colorado State University 2022 Colorado Wildfire Risk Assessment map and highlights that the “Fire Intensity” rating for the site is low to moderate. Micheal provides “Recommended Wildland Fire Mitigation Measures” for the site beginning on page 14 of the Plan. The recommendations include creating a noncombustible perimeter, a managed fuel break beyond that noncombustible perimeter, and mowing along access roads. Initial implementation and routine long-term maintenance of the site pursuant to these recommendations is anticipated during and after construction to minimize the wildfire risk to the site.

Will any AI Fire spot cameras be located on the property or near the Transmission line corridor?

Snow and Avalanche Potential

The Colorado Avalanche Information Center (CAIC) tracks avalanche events in the State of Colorado. The CAIC interactive mapping website identifies that a total of 11 avalanche events have occurred in El Paso County in the past 10 years (September 27, 2016 to September 27, 2026). All but one of those avalanche events occurred west of Interstate 25, and the one event that occurred east of Interstate 25 was located approximately two and one-half (2½) miles south of the El Paso County/Douglas County line in northern El Paso County (see Attachment M, Colorado Avalanche Information Center Avalanche Explorer Map). Due to the total lack of recent avalanche event history in the area and the relatively flat grade of the property, the potential for an avalanche event on the site is extremely low.

The National Weather Service (NWS) provides monthly climate summaries for specific areas throughout the nation. NWS historic precipitation data ranging from July of 1948 to June of 2023 identifies an annual average snowfall total for the City of Colorado Springs for the last 30 years of 33.6 inches. (*source:* https://www.weather.gov/pub/climateCosSeasonalSnowfall). The site is located south of the City of Colorado Springs in an area that typically receives even less annual average snowfall. The minimal amount of annual snowfall in the area is not projected to significantly impact the construction or operation of the project.

Landslide and Rockslide Potential

Attachment J, Soils and Geology Study, prepared by Entech Engineering, Inc. dated September 23, 2026, identifies that the subject site is "found to be suitable for the proposed construction." In addition, page 10 of the Study states the following regarding the site:

> "The existing site grades are relatively flat to gently sloping and do not exhibit sings of any past or potential unstable slopes or landslides."

This finding is further supported by the Colorado Geological Survey (CGS) online GIS mapping resources, specifically the "Colorado Landslide Inventory" GIS database, which shows the nearest occurrence of a mapped landslide to the subject slide is approximately six (6) miles to the northwest in an entirely different geological area of El Paso County located along the Colorado Front Range near Cheyenne Mountain (see Attachment N, Colorado Geological Survey Landslide Inventory Map).

Entech's site investigation and subsequently prepared study did not identify any potentially hazardous rock outcroppings or any evidence of historic rockfall areas nor did it identify any characteristics of the site that would cause it to be more prone to rockfall events.

(h) Specify if excess services capabilities created by the proposed Project will prove likely to generate sprawl or strip development

See below for Table 4-1 as an excerpt from Springs Utilities 2026 Electric Integrated Resource Plan (see Attachment O, 2026 Electric Integrated Resource Plan). This project is intended to cover the loss of the Nixon Power Plant and added growth in the area. This project is not in response to any data center or large load customers. Springs Utilities is building the project to serve customers and requirements to serve Southwest Power Pool Regional Transmission Organization (SPP RTO). This project meetsthe utility's planning requirements and demand.

Table 4-1: Springs Utilities Existing Generation Resources

Unit Name	Category	Summer Nameplate Capacity (MW)	Retirement Date
Nixon Unit 1	Coal	208	12/31/2032
Nixon Unit 2	Combustion Turbine	33	12/31/2054
Nixon Unit 3	Combustion Turbine	33	12/31/2054
Front Range	Combined Cycle	542	12/31/2050
SPAGs	Combustion Turbine	150	12/31/2052
Williams Creek	Combustion Turbine	400	12/31/2060
Manitou 1	Hydro	2.5	12/31/2054
Manitou 2	Hydro	2.5	12/31/2054
Manitou 3	Hydro	0.6	12/31/2054
Tesla	Hydro	28	12/31/2054
Ruxton	Hydro	1.0	12/31/2054
Cascade	Hydro	0.8	12/31/2054
Total Generation		1,401	

(i) Specify whether the demand for the Project is associated with development within or contiguous to existing service areas.

See the response to subsection 2.303(7h) above. Electrical energy demand is the result of planned closure of the Nixon Power Plant, anticipated population growth within Springs Utilities' service territory, and the need for fast ramping generators to balance increased renewable generation penetration.

(8) Surface and subsurface drainage analysis

A surface and subsurface drainage analysis has been prepared for the WCGS and is submitted with this application as Attachment K, Preliminary Drainage Report. The report evaluates existing and proposed drainage conditions for the development in accordance with the El Paso County Engineering Criteria Manual, the Drainage Criteria Manual Volumes 1 and 2, and Mile High Flood District criteria, and establishes the basis for the stormwater conveyance, water quality, and detention facilities shown on the Civil Site Plan. Subsurface conditions bearing on drainage are addressed in the report, and the analysis will be advanced to a Final Drainage Report during construction document development.

(9) Financial feasibility of the project

(a) Relevant bond issue, loan and financing approvals or certifications

In November 2024, City Council approved base-rate increases across all four utility services from 2025-2029, creating the foundation of the five-year financial plan. Although Springs Utilities operates pursuant to a long-term rate structure, the annual budget needs to be approved each year by Colorado Springs City Council. This project remains the number one priority under all listed electric projects.

(b) Business plan that generally describes the financial feasibility of the Project

See Attachment P, Springs Utilities 2026 Annual Operating and Financial Plan. The proposed WCGS project was originally approved by Utilities Board in the 5-year rate case in 2025.

(10) Local infrastructure and services impacts- and will include information describing existing capacity of and demand for local government services including but not limited to roads, schools, water and wastewater treatment, water supply, emergency services, transportation, infrastructure, and other services necessary to accommodate the Project.

The WCGS project will **not** utilize centralized water service from the City of Fountain or rely upon drilling groundwater wells. Water service to the site will come from the Southern Delivery System (SDS) raw water line which transmits Springs Utilities-owned water resources from Pueblo Reservoir to the City of Colorado Springs. The SDS line runs parallel to the project on the same property. Processed water waste from the power plant will flow to an onsite zero liquid discharge (ZLD) system. Flows from the facility will not create additional service obligations or otherwise impact existing wastewater treatment facilities in the area. Natural gas service will be provided by The Rocky Mountain Express Pipeline operated by Tall Grass via a new 160-mile pipeline serving various Springs Utilities locations in El Paso County.

Although the WCGS is located in the Mountain View Electric Association service territory, Springs Utilities will self-serve electricity to the power plant and its appurtenant facilities as it is considered 'Station Power'. The Federal Energy Regulatory Commission Utilities defines Station Power as the electrical energy used by a generating facility for its own internal operations, including heating, lighting, air conditioning, office equipment, and running plant machinery. (see Attachment Q, MVEA Memorandum of Understanding). Thus Utilities will complete the upgrades and work required to tie the power generation into the existing Williams Creek Substation.

(11) Recreational Opportunities

There are no recreational opportunities available on the site as the site is not open to the public for security reasons. As discussed above in Section 2.303(7)(c), the El Paso County Parks Master Plan identifies the potential future alignment of two regional trails located off site. At this time, these two planned trails represent the limited amount of potential future recreation in the general area of the proposed WCGS.

(12) Areas of Paleontological, Historic, or Archaeological Importance- Description of impacts and effect of the Project site on paleontological, historic and archaeological interest.

AK Pioneer Consulting, Inc, prepared Attachment R, Cultural Resources Technical Memo, in support of the proposed 1041 permit application. AK Pioneer Consulting found that a search of the Office of Archaeology and Historic Preservation (OAHP) records "identified 34 cultural resources within one mile of the Project". However, the Memo concludes the following:

> "No known historic properties or significant resources are within the Project APE [Area of Potential Effect]. Potential indirect impacts on historic properties from the Project include vibration, auditory changes, and dust accumulation from machinery, as well as changes to

historical settings related to equipment staging, vehicles, cones, and other temporary construction equipment. These impacts are temporary and will occur only during construction activities. They are unlikely to have long-term adverse effects on the historic significance or character of nearby historic properties."

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

(13) Nuisance- Descriptions of noise glare dust, fumes, vibration and odor levels anticipated by the Project.

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.

(14) Air Quality- Description of the impacts and net effect that the Project would have on air quality during both construction and operation, and under both average and worst case conditions, considering particulate matter and aerosols, oxides, hydrocarbons, oxidants and other chemicals, temperature effects and atmospheric interactions.

During construction, the WCGS project will comply with the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) Land Development General Permit GP03 conditions. Particulate matter emissions will be controlled by adhering to posted speed limits of 30 mph, watering disturbed areas and haul roads as applicable,

excluding earthwork activities when wind speeds exceed 30 mph, and revegetating disturbed areas within one year of project completion. Posted speed limits may be decreased throughout the construction phase pending the number of construction personnel on-site, construction activities occurring and possible deliveries.

Operational impacts on air quality are evaluated through ambient air dispersion modeling (air modeling) performed by a third-party consultant (Ramboll). Preliminary results of the air modeling demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and the Colorado Ambient Air Quality Standards (CAAQS). The final air modeling results and report will be included with the APCD construction permit application.

(15) Visual Quality- Description of the impacts and net effect that the Project would have on visual quality, considering viewsheds, scenic vistas, unique landscapes and land formations within view of the Project area.

The project site is located in a lower elevated and largely undeveloped, rural area of unincorporated El Paso County with the nearest residence located over 1 ½ miles away. The siting location for the proposed power plant is immediately adjacent to an existing electrical substation and solar energy generation facility and shares a parcel with the existing Southern Delivery System Williams Creek Pump Station. In addition, the Fountain landfill is located immediately to the north. These existing non-residential and non-agricultural land uses have already altered the visual quality of the area. Siting a power plant near utility-scale solar energy generation facilities and adjacent to an existing raw-water pump station will not have a significant visual impact in the area beyond the existing impact created by those existing improvements.

See Attachment U, Photo Simulations, and Attachment V, Elevations, for rendering and plan designs for the visual appearance of the facilities. Due to the remote and rural nature of the location coupled with the increased size of the subject parcel, the project is not anticipated to create any negative impacts to viewsheds, scenic vistas, or unique landscapes, particularly when compared to the existing non-residential development in the area that has already occurred to date.

(16) Surface Water Quality

(a) Map or description of surface water relevant to the Project, including description of provisions of the applicable regional water quality management plan, and NPDES Phase II Permit and necessary El Paso County Erosion and Stormwater Quality Control Permit, Section 404 Federal Clean Water Act Permit that applies to the Project and assessment of whether the Project would comply with those provisions.

Bristlecone Ecology, LLC's Natural Landforms, Vegetation, and Wetlands Report, dated September 28, 2026 (Attachment S), documents aquatic resource investigations conducted on September 10 and 22, 2026, within the Project Area and three potential haul-road routes comprising the broader Study Area. No wetlands or other aquatic resources were identified within the generating station Project Area. The swale crossing the Project Area as an ephemeral erosional feature lacked wetlands and an ordinary high-water mark, rather than the riverine feature depicted in the National Wetlands Inventory and National Hydrography Dataset. Within

the broader Study Area, five palustrine emergent wetlands were delineated totaling 1.42 acres and identified one associated linear drainage feature. Wetlands W1 (0.19 acre), W4 (0.32 acre), and W5 (0.11 acre) are associated with outflows from Calhan Reservoir and are presumed to be jurisdictional. Wetlands W2 (0.43 acre) and W3 (0.37 acre) are associated with constructed ponds along the alternate route from Squirrel Creek Road and are considered potentially non-jurisdictional. These classifications represent the consultant's professional assessment and are not final agency jurisdictional determinations.

Any non-exempt discharge of dredged or fill material into federally jurisdictional waters, including wetlands, would require U.S. Army Corps of Engineers authorization under Clean Water Act Section 404 and applicable Section 401 water quality certification or waiver. Discharges into state waters outside federal jurisdiction would require authorization from the Colorado Department of Public Health and Environment under Colorado's dredge-and-fill program, unless an exclusion or exemption applies.

Springs Utilities will comply with all applicable permits. There are no Waters of the United States in the project area. The project will comply with the CO Reg 87 general authorization or individual authorization, as applicable, for any impact to state waters. The project will obtain and comply with all El Paso County stormwater permitting and maintenance requirements for stormwater discharges associated with construction activities.

(b) Existing data monitoring sources

There are no known existing data monitoring sources within the Williams Creek Drainage Basin or on the site for surface water quality.

(c) Description of the immediate and long-term impact and net effects that the Project would have on the quantity and quality of surface water under both average and worst-case scenarios.

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.

(17) <u>Groundwater Quality</u>

This project is not anticipated to impact groundwater. There are no known groundwater aquifers in the vicinity of the project. Water to serve the facility will be imported to the site through the existing Southern Delivery pipeline and treated on-site using a ZLD system.

(a) Map and/or Description of groundwater, including any and all aquifers relevant to the Project. At a minimum the description should include:

i) Seasonal water levels in each portion of the aquifer affected by the Project

There are no known groundwater aquifers in the vicinity of the project.

ii) Artesian pressure in said aquifers

There are no known groundwater aquifers in the vicinity of the project.

iii) Groundwater flow directions and levels

Any alluvial groundwater would generally flow south towards Williams Creek and then follow Williams Creek to Fountain Creek.

iv) Existing aquifer recharge rates and methodology used to calculate recharge to the aquifer from any recharge sources.

There will be no aquifer recharge associated with the project.

v) For aquifers to be used as part of a water storage system, methodology and results of tests used to determine the ability of the aquifer to impound groundwater and aquifer storage capacity.

A tank will be used for onsite storage.

vi) Seepage losses expected at any subsurface dam and at stream-aquifer interfaces and methodology used to calculate seepage losses in the affected streams, including description and location of measuring devices.

There will be no seepage losses. The zero liquid discharge equalization and solar evaporation basins will be lined with an impervious liner preventing seepage loss.

vii) Existing groundwater quality and classification.

There are no known groundwater aquifers; therefore, there is no current quality or classification.

viii) Location of all water wells potentially affected by the Project and their uses.

There are no known water wells in the immediate vicinity of the Project that could be affected by the project.

(b) Impacts and net effect of the Project on groundwater quality

The project will not have an impact on groundwater quality due to the lack of groundwater sources in the area.

(18) Water Quantity

The project will receive water through Springs Utilities infrastructure and will not withdraw water directly from Williams Creek, another on-site surface-water feature, or groundwater well. Specified water uses include potable water supply, hydraulic power augmentation, inlet fogging, NOx-control water injection, turbine washing, sanitary needs, and fire protection. The project will meter water use and process wastewater flow. Process wastewater will be collected and conveyed to the on-site ZLD system, and turbine wash water and oily drains will be separately collected and controlled. The final water balance will document average and maximum demand, consumption, process wastewater generation, feasible reuse and any losses. The supplied record does not quantify incremental effects on Utilities source streams, reservoirs or groundwater. Those effects, including conveyance and evaporation losses, require the Utilities supply assessment and the complete plant and downstream wastewater/basin water balance; no finding of negligible hydrologic impact is made at this stage.

At this stage of the project the following provides the best estimate of water use given the following assumptions:

(1) The combustion turbines are utilizing max water flow as described in their Flow & Instrumentation Diagrams
(2) The combustion turbines are operating at a 75% capacity factor

$$Capacity\ Factor = \frac{Allowed\ Operating\ Hours\ per\ Year\ at\ Full\ Load}{Hours\ per\ Year}$$

(3) Consumption for potable water, turbine washing, sanitary needs, and fire protection are minimal in comparison to the combustion turbine average water usage

The combustion turbines use water for the following three (3) systems:
NOx (emissions) control = 55 gpm per turbine
Hydraulic Power Augmentation (performance boost) = 36 gpm per turbine
Inlet Fogging (required for performance during warm ambient temperatures) = 18.5 gpm per turbine
Total for 10 turbines = 1095 gpm

Operating hours
8760 hours/year = 525,600 minutes/year
@ 75% capacity factor = 394,200 minutes/year

Consumption
1095 gpm @ 394,200 minutes/year = 431.7 million gallons/year
Average rate = 1.18 mgd

(a) Map or description of existing stream flows and reservoir levels.

A map showing the Southern Delivery System Raw Water line from Pueblo Reservoir to Williams Creek Site and additional infrastructure taking water off SDS to the power plant has been provided at Attachment CC.

(b) Map or description of existing minimum Stream flows held by Colorado Water Conservation Board

There are no known streams with minimum stream flows in the area of the project.

(c) Impacts and net effect on water quantity

It is anticipated that less than 2 million gallons per day, 2,240 acre-feet per year, would be needed to support the operations of the plant, fire flow, and sanitary water. Power plant water consumption is directly related power production and plant operations cannot exceed a determined fuel use per year by the CDPHE Air Permit. Springs Utilities can reliably meet 95,000 acre-feet of water demands each year with its current water rights portfolio. For the past 5 years, Springs Utilities' customers have used approximately 72,000 acre-feet per year of water. Colorado Springs owns and operates sufficient water supplies to meet the demands of both customers and this project.

(d) Methods for efficient water utilization

The project will use water efficiently by relying on simple-cycle generation, metering plant water and processed wastewater flows, selecting treatment equipment based on actual water-quality requirements, and collecting process streams for controlled management. Demineralized water and treated-water storage will allow water to be produced and used according to operational demand. Turbine-wash water, oily drains and other process waste streams will be segregated to prevent contamination of otherwise clean stormwater. Water will be recycled or reused where technically practicable, compatible with equipment warranties and water-quality requirements, and allowed by applicable law. The final water balance and operating procedures will identify the specific reuse streams and quantify anticipated freshwater demand, wastewater production and reuse to the extent supported by final design data.

The site is being designed as a ZLD system. The power plant requires source water to be purified to demineralized water through a Reverse Osmosis system. The Reverse Osmosis process to produce demineralized water will generate processed wastewater which will be reused to the greatest extent possible via the zero liquid discharge system. The zero liquid discharge system will accept the processed wastewater, treat it, and return water for reuse in the power plant. The remaining product will be a brine concentrated solution which will be discharged to a concrete containment basin for natural evaporation to remove any remaining liquid leaving behind a solid cake for site disposal at a certified disposal facility.

(19) Floodplains, Wetlands, and Riparian Areas; Wildlife and Wildlife Habitat

(a) Applicant shall only provide description of foregoing natural conditions, animal and plant life, at but not to exceed level of detail required by other federal, state permits or review which are applicable to the Project.

Existing natural conditions are documented in Bristlecone Ecology, LLC's September 28, 2026, Natural Landforms, Vegetation, and Wetlands Report (Attachment S), which evaluated the Project Area and three potential haul-road routes. The generating station site is classified as FEMA Zone X, an area of minimal mapped flood hazard, and describes predominantly flat to gently rolling short- and mid-grass prairie dominated by blue grama, sand dropseed, western wheatgrass, and alkali sacaton. No wetlands, riparian habitat, or other aquatic resources were identified within the generating station Project Area; the swale crossing its western portion was characterized as an ephemeral erosional feature without wetlands or an ordinary high-water mark. Along the potential haul routes, five emergent wetlands were delineated totaling 1.42 acres. These areas support wetland vegetation including cattails, rushes, and bulrushes and may provide habitat for amphibians and other aquatic-associated wildlife. The upland grasslands provide habitat for migratory birds, small mammals, reptiles, and potentially larger mammals such as deer, pronghorn, and coyotes; no mammals, amphibians, or prairie dog colonies were observed during the reconnaissance. No suitable habitat for Preble's meadow jumping mouse within the Project Area was identified and considered burrowing owl use unlikely because suitable burrows were absent but identified limited milkweed habitat for monarch butterflies and potential eastern black rail habitat near Wetland W1 along the Texas Route. Development would disturb grassland habitat, while wetland and riparian impacts would depend on the selected haul route and final improvement limits. The recommendation is to avoid these aquatic habitats and identifies the Texas Route as potentially avoiding all five wetlands; final impact limits and agency coordination remain to be confirmed.

The Bristlecone study depicts a drainage through the site- will this be filled in and the drainage be rerouted establishing new potential habitat for displaced Flora and Fauna?

(20) Soils, Geologic, Conditions and Natural Hazards

The preliminary geotechnical investigation prepared by Entech Engineering (see Attachment J) included eleven borings to depths of approximately 20 feet and identified localized sandy clay fill, native stiff-to-hard sandy clay and claystone bedrock. The native clay exhibited moderate-to-high collapse and expansion potential. Tested claystone exhibited low-to-moderate potential, although local experience indicates that some claystone may be highly expansive. Groundwater was encountered in one boring at approximately 17.5 feet below ground surface and may fluctuate seasonally. Feasible foundation systems include drilled piers bearing in claystone or shallow foundations with appropriate swell mitigation, potentially including approximately 4 to 10 feet of overexcavation, replacement with non-swell-susceptible fill and moisture conditioning. The project will also incorporate appropriate compaction, excavation-support and sulfate-resistant-concrete measures.

(a) Map of Geologic Conditions and Natural Hazards

See Attachment J, Soils and Geology Report, prepared by Entech Engineering.

(b) Description of risks from natural hazards

See the response to Section 2.303(7)(g) included above for a detailed analysis of the risks from natural hazards.

(c) Impacts and net effect on soil and geologic conditions

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. Stormwater will be conveyed through designed drainage facilities, and disturbed areas will be stabilized to limit erosion. The project will not involve mining or extraction and is not expected to alter regional geologic conditions. The final net-effect determination remains subject to the geotechnical, grading, drainage and erosion-control designs. Preliminary detention-pond infiltration testing reports an adjusted average of 0.061 inch/hour, excluding test P3; rates may vary with final pond elevation. This supports the need for site-specific drainage design, not a finding that infiltration alone will control runoff.

A soils and geology report has been completed for the Project (see Attachment J). Subsurface conditions consist of native clay soils overlying claystone bedrock, with bedrock encountered at depths ranging from approximately three to seventeen feet below existing grade. The clays and claystone exhibit moderate to high expansion potential, which is the governing geotechnical condition at this site. Groundwater was encountered in only one boring, at approximately seventeen feet below grade. Soluble sulfate concentrations in the near-surface soils present a severe exposure condition for concrete placed below grade. The site presents no slope instability, no mapped geologic hazard, and no unusual subsurface complexity.

The Project's impact on these conditions is the soil disturbance associated with conventional industrial site development: grading across the development area, excavation for building and equipment foundations, excavation for the process water basins and stormwater detention basins, trenching for buried utilities, and placement of engineered fill. The Project involves no mining, no aquifer dewatering, and no alteration of bedrock structure beyond localized excavation.

The design accommodates the expansive soils rather than working against them. Foundation systems are selected to carry structural loads while resisting the uplift that expansive soils generate, and where structures bear near the surface the expansive material is mitigated by over-excavation and replacement with non-expansive fill, moisture conditioning, or a combination of the two, with confirmatory testing during placement to verify that the treated subgrade performs as designed. Concrete placed below grade is proportioned for severe sulfate exposure. Engineered fill is placed and compacted to established density and moisture requirements in controlled lifts. Excavations are sloped, benched, or supported in conformance with OSHA requirements. Erosion and sedimentation during construction are controlled under a site-specific Stormwater Management Plan and Grading and Erosion Control Plan approved before construction begins, the existing tributary drainageway is stabilized to limit scour, and existing vegetation is preserved to the maximum extent practicable.

The net effect is bounded and local. The Project permanently converts approximately ninety-six

acres from undeveloped rangeland carrying roughly fifty percent cover of native grasses, weeds, and low shrubs to industrial use, and within building, equipment, and basin areas it replaces or conditions the expansive near-surface soils. No regional geologic condition is altered and no geologic hazard is created or aggravated; the expansive soil condition characteristic of the site is engineered for onsite rather than transferred to adjacent property. Final design explorations will be completed prior to construction and the foundation and earthwork approach confirmed against them.

(21) Hazardous Materials

(a) Description of Hazardous Materials

list or refer to a supporting exhibit that identifies such materials

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.

(b) Location of storage areas and plans for contamination

Springs Utilities operational storage requirements are detailed in Attachment Z, Operations and Maintenance Plan.

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.

Chemical storage. Treatment chemicals are stored at the two points of use. At the pump house, chemical storage serves the potable water treatment system and the disinfection of stored raw water. At the ZLD building, chemical storage serves process treatment and comprises of bulk tanks for acid as well as totes for acid, caustic, antifoam, and antiscalant, each paired with its dosing pumps and skids. Chemical storage tanks are located adjacent to the buildings they serve, as shown in elevation on the Elevation Views, so that chemical transfer distances are short and the storage areas remain outside occupied spaces. A lube oil skid serving the vapor compressors is located within the ZLD area alongside the equipment it supports and is the only significant lubricant inventory in this scope. The diesel engine driving the emergency fire pump at the pump house is the only significant fuel inventory.

Process wastewater storage and treatment. 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.

Domestic wastewater. All domestic wastewater produced at the facility is collected and treated by a centralized onsite wastewater treatment system, using technology and methods acceptable to the governing regulatory authorities and appropriate to site conditions. The system serves the guard shack, the ZLD building restrooms, and the control building, consolidating those sources into a single treatment and disposal system located in the allocated sanitary and septic area shown on the Plot Plan.

Spill containment. During construction, appropriate types and quantities of spill response supplies and personal protective equipment are maintained readily available and strategically located on site through substantial completion. Control measures sufficient to prevent and reduce pollutant releases are provided, installed, inspected, and maintained, and equivalent control measures are maintained during the handling, storing, loading, transporting, and disposing of waste to prevent releases to environmental receptors. All work-generated material, whether solid waste, non-hazardous liquid waste, hazardous waste, or asbestos-containing waste, is disposed of at approved facilities, and a waste management plan covering chemical usage and waste generated by the work is prepared and maintained. For the permanent works, containment follows the guidelines in El Paso County Drainage Criteria Manual Volume 2, Section 4.2, governing covering, storage handling, and spill containment and control. Because this filing proposes industrial land use, the site-specific best management practices developed with the Final Drainage Report address the elevated risk of chemical leaks, secured waste facilities, industrial spill cleanup procedures, and secondary containment for transformers. Hazard communication is provided through signage installed throughout the facility, identifying hazardous areas, fluid type and flow direction, confined spaces, and electrical hazards, with scope and standards developed jointly with the owner's safety and health team.

(22) Monitoring Plan and Mitigation Plan

(a) Mitigation that is proposed to avoid, minimize, or compensate for adverse impacts of the Project and to maximize positive impacts.

There are no identified cultural resources within the project area. If a suspected or potential cultural resource is identified during construction, all work in the direct vicinity will cease until a professional archeologist, anthropologist, historian, or other cultural professional clears the site for further activity.

There are no anticipated impacts to threatened or endangered animal or plant species. Prior to mobilization, an active nesting bird survey will be conducted. If a nest is identified, a species-specific buffer area will be established to prevent disturbance of the active nest. Project mobilization is planned to occur in the winter months prior to the nesting season for most migratory birds. The project area is not within any critical wildlife habitat or terrestrial migratory patterns.

Any permanent loss to state waters or wetlands are anticipated to be mitigated through on-site

mitigation or either the purchase of bank credits or payment to an In-Lieu Fee program, preferably through the Fountain Creek Watershed District, as approved by the CDPHE WQCD.

On-site stormwater collection, conveyance, and detention will be designed in accordance with water right retention requirements while limiting the off-site flow rate to no greater than pre-construction flow rates.

The facility is designed as a zero liquid discharge (ZLD) system, with all industrial and process water streams processed on-site with no liquid discharge to sanitary sewer, ground water, or surface water. The on-site ZLD processing facility will consist of an open-air equalization basin and two open-air solar evaporation basins. All ZLD basins will be lined to prevent seepage to groundwater.. Basins are designed with a 2-ft free board capacity andmonthly precipitation volumes (1991-2020 NOAA/NWS 30-year Climate Normals) are incorporated in the non-freeboard basin sizing.

The combustion turbines are equipped with top tier control technologies. Nitrogen Oxides (NOx) generation is controlled through water injection in the combustion chamber. Selective catalytic reduction will be utilized to control post-combustion NOx emissions. Volatile Organic Compounds (VOC), Cabron Monoxide (CO), and organic toxics emissions will be controlled with a post combustion oxidation catalyst.

Fugitive dust will be managed in accordance with the CDPHE Land Development General Permit GP03. To control fugitive dust emissions, unpaved roads and other disturbed surface areas will be watered as necessary, vehicle speed limits of 30 mph will be established and posted for unpaved roads and disturbed areas, earthwork will not occur if sustained windspeeds exceed 30 mph, and disturbed areas will be revegetated or stabilized per the design drawings.

The Springs Utilities Noxious Weed Management Program provides a structured, adaptive framework to identify, control, and deter invasive plant species across Utilities-controlled lands, watersheds, corridors, and operational facilities. Guided by the Colorado Noxious Weed Act and state environmental regulations, the program operates on a 5-step strategic cycle—combining systematic property surveys, risk-based prioritization, site-specific treatment, and long-term monitoring with preventative land management practices. Administered jointly by Environmental Services and Watershed Planning, the program utilizes licensed contractors to execute noxious weed surveys, multi-season treatments, and ensure detailed GIS and compliance reporting. Ultimately, the program protects local ecosystems, preserves watershed health, and mitigates wildfire and operational risks to safeguard critical utility infrastructure and support community resilience. The WCGS site will be incorporated in the Utilities Noxious Weed Management Program and will include a minimum of three consecutive years of noxious weed treatment post construction and long-term vegetation monitoring. The first three years of noxious weed control will be paid by the project budget, following that time the cost will be incorporated in the annual noxious weed control budget.

i) Describe how and when mitigation will be implemented and financed

Several plans and reports have been included in this application to help minimize and mitigate adverse impacts to the project site.

In preparing for site development, Utilities prioritized obtaining reports and conducting studies to understand the environment, wildlife, and cultural resources present on the site to ensure that the project would not interfere with such findings. In doing so, the Utilities will work to avoid any

potential cultural zones identified, create engineering design plans to avoid or at a minimum reduce impacts to wetlands as well as mitigate and minimize impact to the wildlife identified in the area. Vegetation removal will be limited to the areas within the siting envelope affected in the site design. A Noxious Weed Management Plan (Attached W) has been prepared by Bristlecone Ecology to help mitigate the presence of noxious weeds throughout the life of the project.

During the construction process, a grading and erosion control plan, which is required with the subsequent site development plan application, will be implemented to minimize impacts due to erosion. In addition, a Preliminary Drainage Report (see Attachment K) has been included to provide preliminary drainage designs for the site to ensure all stormwater runoff can be properly detained and treated. A Final Drainage Report will be required and provided at the site development plan stage of development.

Attachment X Lighting Plan has been provided in support of this application. All onsite lighting will be required to comply with the lighting standards included in Chapter 6 of the El Paso County Land Development Code unless otherwise exempt under the same Code.

Utilities plans to use the existing access to the site via Birdsall Road for all construction hauling activities, which will help ensure that any impacts associated with such hauling will be limited to a single access point (see Attachment E, Haul Route Map). Passenger vehicle trips into and out of the site will also occur at the site access along Squirrel Creek Road. Impacts associated with these trips have been accounted for in the Traffic Impact Study prepared by SM Rocha, LLC (see Attachment Y).

Attachment Z Operations and Maintenance Plan has been prepared in support of this application. The Plan provides general operations standards for the facility and specific, including specific provisions associated with nuisance-related concerns such as noise, dust, glare, etc.

Each of these planning efforts will help avoid and minimize potential negative affects to the site and help Utilities work toward positive impacts and reasonable methods of maintaining the site.

ii) Describe impacts that are unavoidable that cannot be mitigated.

Unforeseeable risks to the site include wildfires and natural disasters. Although these types of events are generally considered to be unavoidable, the project will implement several measures to help prepare for and even mitigate their impacts (see Attachment L, Wildland fire Risk and Hazard Mitigation Plan, Attachment K, Preliminary Drainage Report, Attachment AA, Emergency Response Plan, and Attachment BB, Evacuation Plan).

(b) Methodology to measure impacts of the project and effectiveness of proposed mitigation measures.

Revegetation establishment cover will be monitored through reoccurring stormwater inspections. Stormwater inspections will occur in accordance with the El Paso County and CDPHE stormwater permits throughout the project and will continue until satisfactory vegetation cover is established. Satisfactory vegetation cover will be defined as 70 percent of the pre-construction cover and less than 10 percent noxious weeds. Any applicable wetland delineation and noxious weed identification will be performed by a qualified environmental consulting firm.

The ZLD basins/ponds levels will be monitored by operations at the ZLD control building.

Basin/pond levels will be managed at or below the designed 2-foot free board capacity.

The combustion turbine emissions will be monitored by a Continuous Emission Monitoring System (CEMS), which provides real time emission values. Any control technology degradation and performance problems will be identified in CEMS data analysis and preset alarms.

(c) Description, location and intervals of proposed monitoring to ensure that mitigation will be effective.

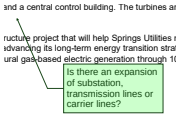
See Attachment D, 1041 Map, and the supporting impact mitigation plans and reports for the location and more detailed descriptions of the proposed impact mitigation measures. Ongoing monitoring will occur, with some mitigation measures (such as those pertaining to erosion controls and traffic impacts) will need to be monitored with greater regularity during project construction, while others (such as noise, lighting, wildland fire mitigation, and drainage system performance) will need to be continually monitored even after construction is complete during operation of the facility.

(23) Additional Information

There has been no additional information requested at this time.

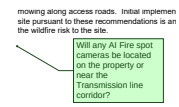
V1_1041 Documents Related to 2.303 (Items 1-23).pdf Markup Summary

dsdparsons (4)



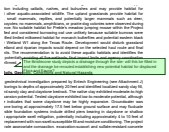
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Is there an expansion of substation, transmission lines or carrier lines?



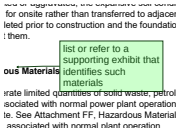
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Will any AI Fire spot cameras be located on the property or near the Transmission line corridor?



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The Bristlecone study depicts a drainage through the site- will this be filled in and the drainage be rerouted establishing new potential habitat for displaced Flora and Fauna?



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list or refer to a supporting exhibit that identifies such materials