

April 27, 2026

PCD# PPR261

El Paso County Planning and Community Development Department
2880 International Circle, Suite 110 Colorado Springs, CO 80910

Re: Letter of Intent for Site Development Plan - Crosspoint Substation Project

Dear El Paso County Planning and Community Development Department:

This Letter of Intent is submitted in support of the Site Development Plan (SDP) application for the proposed Crosspoint Substation Project (Project) located in El Paso County, Colorado. The Project involves the construction of a new 230-kV substation on an 81.58-acre parcel owned by Tri-State Generation and Transmission Association, Inc. (Tri-State). This letter summarizes the proposed request and demonstrates compliance with requirements for approval of a site development plan as outlined in Chapter 6 (General Development Standards) of the El Paso County Land Development Code (LDC).

The Project is designed to comply with all standards in Chapter 6 of the LDC through site-specific engineering, minimal disturbance (10-acre fenced footprint on 81.58 acre parcel), best management practices, and supporting studies (e.g., Drainage Report and Geotechnical Report).

Owner Name, Contact Telephone Number, and Email for Responsible Party

Owner: Tri-State Generation and Transmission Association, Inc. (Tri-State)

Responsible Party: H. Steven Gray

Senior Manager Land Rights and Permitting

Contact: (303) 254-3649; steve.gray@tristategt.org

Applicant Name (if not owner), Contact Telephone Number, and Email for Responsible Party

Same as above.

Property Address

780 N. Lauppe Road
Calhan, CO 80808

Property Tax Schedule Number

1400000592

Current Zoning of the Property

A-35 (Agricultural District, 35-acre minimum).

Discussion Summarizing the Proposed Request and Compliance with the Applicable Requirements of the Land Development Code

Tri-State is seeking approval of a Site Development Plan to construct the Crosspoint Substation, a new 230-kV substation that sectionalizes the existing 230-kV Lincoln-Midway transmission line. A 1041 Permit for the site was approved by El Paso County Planning and Community Development on August 13, 2025 (AASI-25-001). The substation will occupy approximately 10 acres within the 81.58-acre parcel and include a 230-kV three-breaker ring bus (expandable to six), a 230/69-kV 60 MVA transformer, a 69-kV ring bus, and associated equipment. The site will also include an access road from N. Lauppe Road, drainage features, and space for future expansion and distribution lines (69-kV or less) to serve MVEA and SECPA. Site preparation involves grading, fencing, grounding, and foundation construction. The parcel allows for a potential future right-of-way along the existing transmission line for additional capacity, though this would require a separate application.

The Project complies with requirements in Chapter 6 of the LDC as follows:

- **Section 6.1 – General:**
 - **6.1.1. Purpose:** The Project is needed to sectionalize essential infrastructure and optimize electricity delivery to utility services areas. It is designed to minimize conflicts with surrounding grazing and residential areas.
 - **6.1.2. Applicability:** The SDP applies to a major utility facility; all standards met via engineering plans provided with this SDP submittal. The site was chosen for its compatibility with the allowed uses of agricultural (rural A-35) zoned property.
 - **6.1.3. Americans with Disabilities Act (ADA) Site Accessibility:** Not applicable.
- **Section 6.2 – Development Standards for Ancillary Facilities and Activities:**
 - **6.2.1. Fences, Walls, and Hedges:** The substation will be enclosed by a chain-link fence with anti-climb topping for security. Transparent fencing minimizes viewshed obstruction and potential for criminal activity. Existing topography and vegetation will provide natural screening in addition to a 750+ foot buffer to the nearest residence.
 - **6.2.2. Landscape Requirements:** Because there is no water available on site to support ornamental landscaping, Tri-State will restore all disturbed areas to their pre-construction condition using native materials adapted to a

semi-arid climate. This approach allows the site to blend naturally with its surroundings while preserving the rural character (see landscaping summary included in this SDP submittal).

- **6.2.3. Lighting:** Outdoor lights will only be used as necessary for worker safety during routine maintenance and emergencies. All lights will be cast downward towards the interior of the substation yard.
- **6.2.4. Motor Vehicles (moved):** N/A
- **6.2.5. Parking, Loading and Maneuvering Standards:** The substation will operate unmanned 24 hours a day and requires no on-site or off-street parking. To accommodate 5-16 vehicles per day during construction, a permanent gravel access road and a temporary gravel staging area will be located near the Project within the 81.58-acre parent tract. Post construction, maintenance and inspection vehicles will be limited to 5-10 vehicles annually, with specialized equipment if any major repairs are needed.
- **6.2.6. Pre-Subdivision Site Grading:** The grading plan for the Project was developed based on the findings of the drainage report, which defined existing drainage patterns, runoff requirements, and key elevation controls. This plan and report are included as part of this SDP submittal. These analyses informed the placement of design contours, spot elevations, and the detention pond to ensure proper stormwater management and compliance with design standards.
- **6.2.7. Optional Standards:**
 - **B. Dust and Debris Control:** During construction of the Project, water trucks will be utilized to suppress dust created by vehicles and equipment. Revegetation of disturbed areas will be implemented after construction to stabilize soils and reduce dust generation.
 - **C. Electromagnetic and Electrical Interference:** The Colorado Public Utilities Commission (PUC) standard for an acceptable electromagnetic field (EMF) at the boundary of a substation is 150 milliGuass (mG). Magnetic field analysis at the Crosspoint Substation fenceline is between 1-14 mG, well within the guidelines set by PUC.

- **D. Humidity, Heat, Glare, Smoke, or Radiation:** Nuisance-level heat, glare, or smoke are not anticipated during construction or operation of the Project. The Project will not produce humidity or ionizing radiation.
 - **E. Noise:** The Colorado Public Utilities Commission (PUC) and El Paso County both have noise regulations. The Project compliance is assessed relative to the most stringent 50 dBA limit applicable to residential zoned land at the closest noise sensitive receptor, being a residence 767 feet north of the project site. A noise model predicted received sound to be 51 dBA at 25 feet from the north property boundary, and 44 dBA at the nearest residence.
 - **6.2.8. Maintenance Plans:** The Project will be designed, constructed, operated, and maintained to meet or exceed all applicable standards of design and performance set forth in the National Electric Safety Code (NESC 2023). In addition, substation maintenance will comply with all applicable federal, state, and local laws and regulations. Tri-State conducts detailed annual inspections and uses satellite and drone technology to proactively identify maintenance needs and prevent system failure. In addition, a vegetation management program will be implemented to eliminate fire fuels near the facility. There will be no public water, sewer, gas, or telecom to maintain. Stormwater will be managed with the on-site detention pond, and electricity will be self-supplied.
 - **6.2.9. Signs, Off-Premises:** No signage will be required off-premises.
 - **6.2.10. Signs, On-Premises:** For safety, high-voltage warning signs will be posted on the security fence surrounding the substation yard. There will be no freestanding signs proposed.
- **Section 6.3 – Environmental Standards:**
 - **6.3.1. Air Quality Standards:** Construction activities associated with the Project would temporarily generate less than significant amounts of particulate matter from soil disturbances and diesel-powered equipment, and less than significant amounts of carbon monoxide and the precursor pollutants to ozone formation from tailpipe emissions. Any air pollutants generated would be widely dispersed across the Project area, short term in duration, and minimized by the small scale of construction operations for the substation. Air pollutants also would be minimized through implementation of dust suppression and proper vehicle maintenance. Upon completion of

earth-disturbing activities, all disturbed areas will be revegetated or otherwise stabilized. There would be no long-term air quality effects associated with routine operation and maintenance of the substation.

- **6.3.2. Drainage and Floodplain:** A stormwater detention pond will be constructed in accordance with El Paso County regulations. Prior to construction, a Construction Stormwater Discharge Permit for Construction Activities will be obtained from CDPHE and an ESQCP with El Paso County. The Project will adhere to the best management practices outlined in the Stormwater Management Plan (SWMP). The site is outside of the FEMA 100-year floodplain (per National Flood Hazard layer). No fill or structures will be within a floodway.
- **6.3.3. Fire Protection and Wildfire Mitigation:** Tri-State's wildfire mitigation plan exists to safeguard communities and protect their system, ensuring the delivery of safe, reliable and affordable electricity. Wildfire mitigation plans are site specific and include monitoring, regular maintenance, vegetation management ,and system hardening.
- **6.3.4. Forestry:** There are minimal trees and vegetation on the fallow site (not applicable for preservation). Disturbed areas will be reseeded with an El Paso County native grass mix after construction.
- **6.3.5. Grading and Erosion Control:** There will be no severe changes in grade on this flat grassland parcel (<15% slopes per Geotechnical Report included as part of this SDP submittal). There will be no erosion risks typically associated with disturbance on slopes >15%. Grade changes will mainly be associated with the drainage pond. Grading and Erosion Control Plan (GESG) includes best management practices and revegetation measures, including silt fences, straw wattles, and velocity checks during construction. Disturbed areas will be reclaimed with native materials and stabilized.
- **6.3.6. Habitat Conservation Plans:** No federally designated critical habitat or federally managed conservation areas are within the project area. As proposed, the Project is not anticipated to overlap suitable habitat for federally listed species and impacts should not occur. By preserving the rural character on undeveloped portions of the parcel, the Project aligns with A-35 conservation goals.

- **6.3.7. Noxious Weeds:** Tri-State is committed to noxious weed management throughout the life of the facility. Vegetation management work will include targeted control or elimination of unwanted vegetation.
- **6.3.8. Wetlands:** The project is located within the Horse Creek Subbasin of the Upper Arkansas River Basin. Surface waters within the project area are nonexistent based on desktop review and field survey observations; the USFWS National Wetlands Inventory, US Geological Survey National Hydrography Dataset, and Colorado Natural Heritage Program Wetlands Inventory Mapping Tool show no aquatic resources as present in the project area.
- **6.3.9. Wildlife:** Impacts to wildlife will be minimal and temporary if present. Impacts to wildlife may include temporary disturbances from construction activities that may cause temporary avoidance of the area by some species. No long-term impacts are expected.

The Project aligns with the El Paso County Master Plan by maintaining consistency with adjacent agricultural and rural residential place types, as utility facilities are commonly located in such areas without conflicting with farming or ranching. The Project will provide a vital electric utility service to residents of the County. The Project aligns with the core principles and goals of the El Paso County Master Plan including chapters 3 through 12.

Discussion Regarding How the Proposed Request Complies with the Definition of the Proposed Use and Any Applicable Use-Specific Standards Within the Land Development Code

The proposed use is a "Major Utility Facility" (substation) as defined in the LDC (Chapter 2, Article 20), which includes facilities for the generation, transmission, or distribution of electricity. This complies with use-specific standards in Chapter 5 (Use Regulations) for utilities in the A-35 zone (Table 5.1), where such facilities are permitted subject to SDP approval and 1041 review. The substation is not an agricultural use but is compatible with the A-35 district's purpose (Section 4.1.1) to accommodate rural communities and lifestyles, including conservation of farming and ranching resources. The presence of the existing transmission line and ongoing agricultural activities demonstrates compatibility. No residential, commercial, or industrial structures are proposed, and the design minimizes visual and operational impacts through siting away from residences and use of weathering steel structures. The design meets standards for height, setback and lot coverage (e.g., structures <100 ft, >50 ft setbacks).

Discussion Regarding the Provision of Utilities

No permanent utilities are required for the substation (per 6.2.1). There will be no connection to public water or sewer systems. Portable sanitary toilets with regular servicing will be provided during construction only. Power for the substation will be self-supplied from the grid. Drainage will be managed on-site via a detention pond and grading designed per the Drainage Report , ensuring no off-site impacts (per 6.3.1). Stormwater will comply with CDPHE Construction Stormwater Discharge Permit requirements. No other utilities (e.g., gas, telecommunications beyond internal controls) are needed.

Discussion Regarding Anticipated Traffic Generation and Access

A separate Traffic Impact Study was prepared as part of the 1041 application approval per 6.1.4). In summary, construction traffic will be temporary (4-6 months) and include crew vehicles, delivery trucks, and equipment haulers, peaking at low volumes (e.g., 10-20 trips/day). Access will be from N. Lauppe Road via a new gravel driveway designed to County standards (e.g., sight triangles, turning radii), with no improvements to county roads anticipated. Operational traffic is minimal: 1-2 trips/month by standard pickup trucks for maintenance, with occasional larger vehicles for repairs. No impacts to traffic congestion or safety are expected, and Traffic Control Plans will be implemented during construction as needed.

Per Appendix B.1.2.D of the El Paso County Engineering Criteria Manual, no Traffic Impact Study is required for the project based on the following criteria:

- Vehicular (post construction): (1) Daily vehicle trip-end generation is less than 100 and the peak hour trip generation is less than 10; (2) There are no additional proposed minor or major roadway intersections on major collectors, arterials, or State Highways; (3) The increase in the number of vehicular trips does not exceed the existing trip generation by more than 10 peak hour trips or 100 daily trip ends; (4) The change in the type of traffic to be generated does not adversely affect the traffic currently planned for and accommodated within, and adjacent to, the property; (5) Acceptable Line of Sight on the adjacent public roadways, accesses, and intersections will be maintained; (6) No roadway or intersection in the immediate vicinity has a history of safety or accident problems; (7) There is no change of land use with access to a State Highway.
- Pedestrian Traffic: The proposed use will not generate any new pedestrian traffic.
- Bicycle Traffic: The proposed use will not generate any new bicycle traffic.

Discussion and Justification of Any Alternatives Being Requested

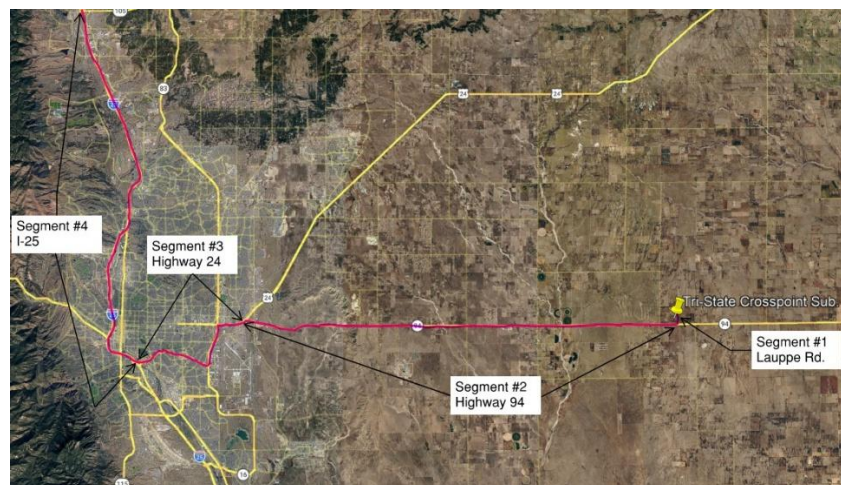
No alternatives to LDC standards are requested (per checklist). The Project design incorporates standard utility practices that inherently comply with or exceed Chapter 6 requirements. Alternative substation sites were evaluated (Table 1 and Figure 2 in 1041 Application, Section 2.303(5)(d)), but the selected site was chosen for its proximity to existing infrastructure, minimal environmental/residential impacts, and landowner agreement. If any site-specific modifications are deemed necessary by the PCD Director, Tri-State is open to discussion.

We appreciate the opportunity to submit this application and look forward to working with the Department to obtain approval. Please contact the responsible party listed above for any questions or additional information.

Road Conditions Report

Tri-State is proposing to construct the new 230-kV Crosspoint substation (Crosspoint) in El Paso County, located north of State Highway 94 (SH 94) near the N. Lauppe Road intersection. The construction operations are planned to begin in July 2026 and are expected to last for a duration of 12-14 months. Material deliveries are expected to start approximately two weeks prior to start of the construction activities.

Tri-State has developed this Road Condition Report to assess any potential accelerated degradation of the County maintained road surfaces that will be utilized by the construction traffic during the construction period. The goal of this report is to conduct an objective road surface condition assessment before, during and after the construction operations have been completed to assess the pavement condition and capture Right-of-Way (ROW) imagery to document the condition of the road sections. Construction traffic is expected to access the Project site via the Haul Route map shown below.



Construction Schedule and Activities

A typical construction workday for this project is expected to consist of workers arriving at the Crosspoint Substation construction area between 6:00 AM and 8:00 AM via N. Lauppe Road. Deliveries will mainly occur between 6:00 AM and 4:00 PM. Most workers will finish their workday and leave the site between 5:00 PM and 6:00 PM. The entirety of the construction activity on-site is expected to be completed within the year 2027.

The timetable of construction activities should generally go in this order:

- Mobilization
- Site preparation
- Construction
 - Foundations
 - Substation structure delivery, erection, and installation
 - Stringing of conductor and static wire
- Testing and commissioning
- Energization
- Cleanup and demobilization

Activities may vary based on construction phasing.

Construction Traffic Estimates

Estimates for construction duration, number of workers and vehicles, quantity of materials and equipment, and number of deliveries required to construct Crosspoint in El Paso County are established by Tri-State and are based on prior experience constructing substations (see table below). Using these estimates, it is anticipated that peak construction traffic for a period of 6 months will be less than 16 vehicle trips per day, including passenger car trips and truck trips. Only 10 passenger car trips per day are anticipated, and it is conservatively assumed that these will occur during peak hours.

Construction workers will access the substation from N. Lauppe Road via State Highway 94. Crews will travel eastbound on State Highway before traveling north on N. Lauppe Road and accessing the site from the east side.

Major Construction Tasks	Approximate Construction Duration (weeks)	Approximate Daily Passenger Car Trips	Approximate Daily Truck Trips by Vehicle Type	Approximate Total Daily Roundtrips
Mobilization	2	2	Light duty – 1 Heavy duty - 2	5
Site Preparation	4	5	Light duty – 2 Heavy duty - 2	9
Foundation Construction	5	5	Light duty – 2 Heavy duty - 3	10
Substation Structure Delivery, erection, and installation	5	10	Light duty – 2 Heavy duty - 4	16
Testing and Commissioning	3	5	Light duty – 2 Heavy duty - 2	9
Energization	3	3	Light duty – 1 Heavy duty - 1	5
Cleanup and Demobilization	2	2	Light duty – 1 Heavy duty - 1	4

Operational Traffic Trip Generation

The Post construction traffic to the development is expected to have negligible impact to the local roadway network. The Crosspoint Substation will operate unmanned 24 hours a day. The number of vehicles accessing the substation will be limited to periodic maintenance and inspection vehicles, which is estimated to be between 5 and 10 vehicles/maintenance trucks annually, with specialized equipment if needed for any major repairs. This will have a negligible impact on the overall operations and safety on State Highway 94 and N. Lauppe Road.

Roadway Improvements

With the impact expected to the County maintained surfaces expected to be negligible, there should be no need to improve the local road when it comes to turn lanes, access modifications, or any signing and striping to accommodate the Crosspoint development.

N. Lauppe Road, located on the east side of the substation, is currently a dirt road and is in good condition. Passenger cars and trucks using N. Lauppe Road are not anticipated to have any impact on the condition of the road. Vehicles using N. Lauppe Road to access the substation should not use N. Lauppe Road when wet or rainy conditions are present, in order to preserve the roadway.

Reporting

Based on the traffic count data and the expected trips generated by the construction activity, and post construction activity, Tri-State does not recommend changes to the current roadway to accommodate the Crosspoint substation. The short-term impacts of the construction activity will be minimal and the long-term operations of the Crosspoint substation will have a negligible impact on the County maintained surfaces. A pre-construction 360-degree video and photos were documented along the exit off Hwy 94 and length of use along N. Lauppe Rd to ensure surface condition does not deteriorate (see attached video and photo files). Upon completion of the Project, another 360-degree video and photos will be documented along the exit off Hwy 94 and length of use along N. Lauppe Rd to ensure surface conditions were not deteriorated as part of the construction operations.