

COLORADO'S POWER PATHWAY

ARTICLE 2.405 REVIEW CRITERIA FOR ALL APPLICATIONS

EL PASO COUNTY SITE SELECTION AND CONSTRUCTION OF MAJOR FACILITIES OF A
PUBLIC UTILITY

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

Requirement	Location in this Document/Permit Application
<p>2.405. Review Criteria for All Applications In addition to the review criteria listed at Sections 3.202, 4.202, 5.202, 6.202, 7.202, 8.202, and 9.202 all applications under these Regulations shall be evaluated against the following general criteria. Following some, but not all of the criteria listed in the above Sections and below are lists of considerations. These considerations are not criteria that the Project must satisfy; they serve solely as guidance. Where such terms as "reasonable," "feasible" and "adequate" are used in the foregoing criteria, the Development Services Director and/or the Permit Authority shall determine in each case what is or is not reasonable, feasible or adequate.</p>	<p>Section 2.405</p>
<p>(1) The health, welfare and safety of the citizens of this County will be protected and served.</p>	<p>Section 2.405(1); Attachment W: Monitoring and Mitigation Plan</p>
<p>(2) The proposed activity is in general conformance with the El Paso County Master Plan, Water Quality Management Plan, NPDES Phase II Permit, or other duly adopted plans of El Paso County. The determination of conformance of the Project with these plans may include but is not limited to the following considerations: (a) Likelihood that the Project will/will not cause or contribute to urban sprawl or "leapfrog" development. (b) Significant changes in the amount of impervious surfaces. (c) Contiguity of development associated with the Project to existing growth centers. (d) Changes to unique land forms. (e) Changes in the amount or character of open space. (f) Changes to traffic patterns, road capacity and congestion.</p>	<p>Section 2.405(2); Attachment I: Transportation Memorandum</p>
<p>(3) The Project is financially feasible. The determination of financial feasibility of the Project may include but is not limited to the following considerations: (a) The business plan submitted by the applicant. (b) Relevant bond issue, loan and other financing approval or certifications (ex: approved bond issue; bond counsel opinion).</p>	<p>Section 2.405(3)</p>
<p>(4) The Project is not subject to significant risk from natural hazards. The determination of risk from natural hazards to the Project may include but is not limited to the following considerations: (a) Faults and fissures. (b) Unstable slopes including landslides, rock slides and avalanche areas. (c) Expansive or evaporative soils and risk of subsidence. (d) Wildfire hazard areas. (e) Floodplains.</p>	<p>Section 2.405(4); Attachment G: Soils, Geologic, and Natural Hazard Areas Map; Attachment H: Emergency Response Procedures; Attachment K: Water Resources Map</p>
<p>(5) The Project will not have a significant adverse effect on the capability of local governments affected by the Project to provide local infrastructure and services, or exceed the capacity of service delivery systems. The determination of the effects of the Project on local government services may include but is not limited to the following considerations: (a) Current and projected capacity of roads, schools, infrastructure, drainage and/or stormwater infrastructure, housing, and other services necessary to accommodate development, and the impact of the Project upon the current and projected capacity. (b) Changes caused by the Project in the cost of providing education, transportation networks, water treatment and wastewater treatment, stormwater drainage, channel stabilization, bridges, emergency services, or other governmental services or facilities. (c) Need for temporary roads to access the Project for construction and maintenance. (d) Change in demand for public transportation.</p>	<p>Section 2.405(5); Attachment N: Existing Transmission Line Map</p>

Requirement	Location in this Document/Permit Application
<p>(6) The Project will not have a significant adverse effect on the quality or quantity of recreational opportunities and experience. The determination of effects of the Project on recreational opportunities and experience may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Changes to existing and projected visitor days. (b) Changes in quality and quantity of fisheries. (c) Changes in instream flows or reservoir levels. (d) Changes in access to recreational resources. (e) Changes to quality and quantity of hiking, biking, or horseback riding trails. (f) Changes to hunting experiences. (g) Changes to open space. (h) Changes to existing conservation easements. (i) Changes to regional or neighborhood parks. 	<p>Section 2.405(6); Attachment F: Land Use and Zoning Map</p>
<p>(7) The Project will not significantly degrade air quality. The determination of effects of the Project on air quality may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Changes in visibility and microclimates. (b) Applicable air quality standards. 	<p>Section 2.405(7)</p>
<p>(8) The Project will not significantly degrade existing visual quality. The determination of visual effects of the Project may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Visual changes to ground cover and vegetation, waterfalls and streams, or other natural features. (b) Interference with viewsheds and scenic vistas. (c) Changes in landscape character types of unique land formations. (d) Compatibility of structure size and color with scenic vistas and view sheds. (e) Changes to open space. (f) Changes to existing conservation easements. (g) Changes to impacts to regional or neighborhood parks. 	<p>Section 2.405(8); Attachment N: Existing Transmission Line Map; Attachment J: Pole Details, Representative Photographs, and Simulations</p>
<p>(9) The project will not significantly degrade surface water quality. The determination of effects of the Project on surface water quality may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Changes to existing water quality, including patterns of water circulation, temperature, conditions of the substrate, extent and persistence of suspended particulates and clarity, odor, color or taste of water. (b) Applicable narrative and numeric water quality standards. (c) Changes in point and nonpoint source pollution loads. (d) Increase in erosion. (e) Changes in sediment loading to waterbodies. (f) Changes in stream channel or shoreline stability. (g) Changes in stormwater runoff flows. (h) Changes in trophic status or in eutrophication rates in lakes and reservoirs. (i) Changes in the capacity or functioning of streams, lakes or reservoirs. (j) Changes to the topography, natural drainage patterns, soil morphology and productivity, soil erosion potential, and floodplains. (k) Changes to stream sedimentation, geomorphology, and channel stability. (l) Changes to lake and reservoir bank stability and sedimentation, and safety of existing reservoirs. 	<p>Section 2.405(9); Attachment L: Preliminary Drainage Analysis</p>
<p>(10) The Project will not significantly degrade groundwater quality. The determination of effects of the Project on groundwater quality may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Changes in aquifer recharge rates, groundwater levels and aquifer capacity including seepage losses through aquifer boundaries and at aquifer-stream interfaces. (b) Changes in capacity and function of wells within the impact area. (c) Changes in quality of well water within the impact area. 	<p>Section 2.405(10); Attachment L: Preliminary Drainage Analysis</p>
<p>(11) The Project will not significantly degrade wetlands and riparian areas, terrestrial or aquatic plant or animal life. The determination of effects of the Project on these areas shall include the considerations raised in the applicable federal and/or state Permits.</p>	<p>Section 2.405(11); Attachment C: Routing and Siting Study for Segment 5;</p>

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	Attachment K: Water Resources Map
<p>(12) The Project will not significantly deteriorate soils and geologic conditions. The determination of effects of the Project on soils and geologic conditions may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Loss of topsoil due to wind or water forces (b) Changes in soil erodibility (c) Physical or chemical soil deterioration (d) Terrain deformation/mass wasting/subsidence (e) Compacting, sealing and crusting (f) Waterlogging (g) Soil morphology and productivity 	Section 2.405(12); Attachment G: Soils, Geologic, and Natural Hazard Areas Map
<p>(13) The Project will not cause a nuisance. The determination of nuisance effects of the Project may include but is not limited to the following considerations: increase in odors, dust, fumes, glare, heat, noise, vibration or artificial light.</p>	Section 2.405(13); Attachment E: Noise and EMF Study; Attachment S: Colorado Public Utilities Commission Decision Regarding Certificate of Public Convenience and Necessity and Noise and Magnetic Field Reasonableness for Colorado's Power Pathway
<p>(14) The Project will not result in unreasonable risk of releases of hazardous materials. The determination of the risk of release of hazardous materials caused by Project may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Plans for compliance with federal and state handling, storage, disposal, and transportation requirements. (b) Use of waste minimization techniques. (c) Adequacy of spill prevention and response plans. 	Section 2.405(14); Attachment T: Fire District Coordination Letters
<p>(15) Urban development, population densities, and site layout and design of storm water and sanitation systems shall be accomplished in a manner that will prevent the pollution of aquifer recharge areas. The determination of potential for pollution of the aquifer recharge areas by the Project may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Proximity of urban development and population densities to aquifer recharge areas. (b) Proximity of stormwater and sanitation systems to aquifer recharge areas. (c) Changes in water quality in the aquifer recharge areas. 	Section 2.405(15)
<p>(16) The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project, or to comply with regulatory or technological requirements. The determination of whether the Project is reasonably necessary may include but is not limited to the following considerations:</p> <ul style="list-style-type: none"> (a) Relationship to reasonable growth projections and local land use plans. (b) Relationship to other providers' service areas. (c) Whether the Project is not in compliance with regulatory or technological requirements or will not be in compliance in the near future. 	Section 2.405(16); Attachment S: Colorado Public Utilities Commission Decision Regarding Certificate of Public Convenience and Necessity and Noise and Magnetic Field Reasonableness

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2.405(15) Urban development, population densities, and site layout and design of storm water and sanitation systems shall be accomplished in a manner that will prevent the pollution of aquifer recharge areas. The determination of potential for pollution of the aquifer recharge areas by the Project may include but is not limited to the following considerations: 16

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2.405(16) The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project, or to comply with regulatory or technological requirements. The determination of whether the Project is reasonably necessary may include but is not limited to the following considerations: 16

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LIST OF ACRONYMS AND ABBREVIATIONS

1041 permit Application	Permit to locate and construct major facilities of a public utility 1041 Permit Application
BMP	Best Management Practice
CPCN	Certificate of Public Convenience and Necessity
CPUC	Colorado Public Utilities Commission
dBA	A-weighted decibels
EMF	Electric and Magnetic Fields
FEMA	Federal Emergency Management Agency
IEEE	Institute of Electrical and Electronics Engineers
mG	Milligauss
NESC	National Electrical Safety Code
Pathway	Colorado's Power Pathway
ROW	Right-of-Way
SWMP	Stormwater Management Plan
USFWS	U.S. Fish and Wildlife Service
WOTUS	Waters of the U.S.
Xcel Energy	Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy

2.405 REVIEW CRITERIA FOR ALL APPLICATIONS

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

In accordance with Section 2.405 of the Appendix B - Guidelines and Regulations for Areas and Activities of State Interest of the El Paso County Colorado Land Development Code (El Paso County §1041 Regulations; El Paso County 2024b), the information in this document describes how Colorado's Power Pathway (Pathway) routing and site selection, construction, maintenance, and operation comply with the review criteria for the Permit Authority approval of the portion of the transmission line subject to this permit to locate and construct major facilities of a public utility (1041 Permit) Application (Application). Each criterion for all applications from Section 2.405 is listed, followed by a description of how Pathway will comply.

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

Pathway is a necessary capital improvement to expand the existing electric transmission grid system in Colorado. The location, construction, and operation of Pathway will comply with applicable federal, state, and local regulations.

Pathway facilities will be designed, constructed, operated, and maintained to meet applicable standards of design and performance set forth in the National Electric Safety Code (NESC). Transmission lines are structurally designed according to the NESC, which incorporates standards from the American Society of Civil Engineers on structural loading. The NESC requires poles over 60 feet tall to be able to resist the loading from various ice and wind scenarios. The base design wind speed for eastern Colorado is 95 miles per hour. This wind speed is part of an equation that also considers terrain, span length between transmission poles, and transmission pole height to produce an overall wind pressure applied to the wires and the transmission pole. In addition, the design scenario considers how the structural capacity of a transmission pole is affected by the icing conditions on the wire. The weight of the ice increases the tension in the wires and therefore the loading on the transmission pole. The result of this design scenario is that

transmission lines typically have additional structural capacity for much higher wind speeds than the NESC requires after accounting conservatively for icing conditions.

Electric and Magnetic Fields (EMF) exist wherever electricity is produced or used, including around any electric appliance or wire that conducts electricity. Electric fields are created by voltage—the higher the voltage, the stronger the field. Anytime an electric appliance is plugged in, even if it is not on, an electric field is created in its vicinity. Electric fields are easily blocked by walls, trees, clothes, and skin. The farther the distance from the source of the electric field, the weaker it becomes. EMF extend outward from the conductor wire and decrease rapidly with distance from the conductor. There is no federal standard for transmission line EMF. Additional information is available online at https://www.coloradospowerpathway.com/wp-content/uploads/2023/10/23-10-612-Transmission-EMF-fact-sheet_English_P1.pdf.

A Noise and EMF Study was conducted for Pathway and submitted as part of Pathway's Certificate of Public Convenience and Necessity (CPCN) application and is included as Attachment E. The study concluded that magnetic field levels at the edge of the Pathway transmission line right-of-way (ROW) are projected to be 54.7 milligauss (mG). These levels are below 150 mG and were deemed reasonable by the Colorado Public Utilities Commission (CPUC). The Noise and EMF Study conducted for Pathway determined the maximum projected noise level measured at 25 feet from the edge of the ROW is 49.8 A-weighted decibels (dBA). Per CPUC Rule 3206(f), noise levels below 50 dBA are not subject to further review (4 Code of Colorado Regulations 723-3). The projected noise and EMF levels from the Pathway transmission line were deemed reasonable by the CPUC and not subject to further review. The CPUC Decision Regarding CPCN and Noise and Magnetic Field Reasonableness for Colorado's Power Pathway is included as Attachment S.

Pathway will be designed to minimize the risks from natural hazards, such as high winds and floods. Additional information on design and hazard avoidance and mitigation is provided in Attachment W, Monitoring and Mitigation Plan.

2.405(2) The proposed activity is in general conformance with the El Paso County Master Plan, Water Quality Management Plan, NPDES Phase II Permit, or other duly adopted plans of El Paso County. The determination of conformance of the Project with these plans may include but is not limited to the following considerations:

There are no known conflicts with the El Paso County Master Plan (El Paso County 2021). A detailed discussion of Pathway compliance with the El Paso County Master

Plan is provided in Section 2.303(7)(c) of the Article 2.303 Submission Requirements For All Permit Applications document provided as part of this Application. A summary of Pathway compliance with the chapters of the El Paso County Master Plan is as follows:

Land Use and Housing & Communities: Pathway is compatible with agricultural uses and is sited to minimize impacts to existing agricultural operations. Pathway will also not require additional community or local government services beyond those currently provided in the area.

Economic Development: Pathway will deliver economic benefits to rural communities across eastern and southern Colorado, including El Paso County, over the short and long-term. Pathway coordinated with Schriever Space Force Base and the U.S. Air Force to determine that the route is compatible with existing and future operations associated with their facilities.

Transportation & Mobility: Pathway is not a transportation project and during construction, temporary traffic impacts are expected to be minor.

Community Facilities and Infrastructure: Pathway is a \$1.7 billion investment proposed by Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy) to improve the state's electric grid and enable future renewable energy development around the state. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through its Responding to Utility Emergencies Program. Pathway will utilize erosion and sediment control best management practices (BMPs) to minimize impacts to nearby waterways.

Military: Pathway coordinated with Schriever Space Force Base and the U.S. Air Force to determine that the route is compatible with existing and future operations associated with their facilities.

Recreation & Tourism: Pathway will not impact existing trails or recreation.

Community Health and Environment: By working with individual landowners, obtaining, and meeting applicable federal state and county permits, co-locating the transmission line route, or strategically running the route adjacent to other existing public infrastructure improvements, the Pathway alignment mitigates and minimizes to the furthest extent possible the impacts to the health, safety, and welfare of the adjacent agricultural inhabitants and mitigates and minimizes to the furthest extent possible the impacts to the environment.

Resiliency & Hazard Mitigation: Xcel Energy's facilities are designed, constructed, operated, and maintained to meet or exceed all applicable requirements of the Institute

of Electrical and Electronics Engineers (IEEE) standards and accepted industry standards and practices. The proposed Pathway alignment through unincorporated El Paso County is generally located in areas with low risks from both natural and human-caused hazards. Xcel Energy coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area.

Pathway complies with the Pikes Peak Area Council of Governments Water Quality Management Plan (PPACG 2020). Xcel Energy will comply with permit application requirements, County Standards, and construction protocols to ensure that Pathway does not violate water quality standards. Compliance with applicable federal, state and county construction and waste management procedures will prevent accidental spills or runoff of sediment or contaminants to waterbodies or groundwater. A Stormwater Management Plan (SWMP) will be created, and BMPs incorporated into the design as necessary. Construction activities will be performed using methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. Pathway will not require permanent drawing out of a well or aquifer. Water to be used during construction will be obtained from a local, permitted source. Pathway will not create any wastewater nor have any facilities requiring wastewater treatment. Portable temporary bathrooms that will be serviced on a regular basis will be on site during the construction period. Pathway will avoid regulated floodplains to the extent practicable. Pathway will not require water use during operation.

Pathway complies with the El Paso County Parks Master Plan (El Paso County 2022). Pathway is not located within any designated El Paso County Parks, Open Spaces, Regional Trails, Trailheads, Proposed Trails/Bicycle Routes, Candidate Open Space Areas, or Candidate Regional Parks (El Paso County 2022). During construction and operation, Pathway will not impact any El Paso County parks, open spaces, trails or any recreational activities.

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

The proposed density and intensity of development will maintain current agricultural areas. Pathway will not directly cause significant changes in land use intensity or development in the immediate area. Construction and operation of the transmission line will not interfere with continued use of the surrounding areas for agricultural uses. After construction, current uses adjacent to Pathway facilities will be able to continue and preserve desirable community and rural patterns.

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

Construction of the transmission line will not create runoff beyond previous site levels, will not change existing topography, or adversely affect drainage. No alteration in the pattern or intensity of surface drainage will result from the construction or operation of the transmission line. Once construction has been completed, disturbed areas will be restored in a manner similar to pre-construction conditions.

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

Pathway is not located near any residential areas or growth centers. Pathway will install necessary infrastructure while minimizing impact on surrounding land. The impacted surface use owners can continue to maintain their current agricultural uses, except under the footprint of the individual transmission poles. Pathway has been routed to minimize impacts on individual landowners; factors evaluated during siting of the transmission line include proximity to property boundaries and built structures and adjacency to other existing utility easement corridors and road ROW.

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

Pathway will not result in changes to unique land forms. No significant natural hazards have been identified in the areas planned for Pathway development in El Paso County. Professional engineers will guide construction and do not foresee any unusual risks.

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

Pathway will not result in changes to the amount or character of open space. By working with individual landowners, collocating the transmission line route, or strategically routing adjacent to other existing public infrastructure improvements, the Pathway alignment has minimized the impacts to adjacent agricultural and rangeland uses to the extent practical.

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

Construction of Pathway is not expected to cause significant effects to El Paso County transportation, and any impacts will be temporary in nature. Work crews will mobilize each day from the laydown yard to the work areas. Traffic to local work areas will be limited to supervisory vehicles transporting work crews, required construction equipment, and equipment delivery vehicles. Construction equipment or labor transportation are not anticipated to have a significant impact on traffic volumes or flow on local roadways or state/county highways. Any increases in traffic will be short term

and limited to the construction time period near individual transmission poles. The Transportation Memorandum is provided as Attachment I.

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

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

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

The applicant has the financial ability to develop and operate Pathway. Per the CPUC's CPCN approval on June 2, 2022, Pathway is deemed to be in the public interest and recovery of the anticipated cost of Pathway is appropriate. The CPCN for Pathway states that Xcel Energy had met its burden of proof. The CPUC evaluated extensive cost and schedule information in arriving at this decision.

2.405(4) The Project is not subject to significant risk from natural hazards. The determination of risk from natural hazards to the Project may include but is not limited to the following considerations:

2.405(4)(a) *Faults and fissures.*

No significant natural hazards have been identified in the areas planned for Pathway development in El Paso County, including faults and fissures, unstable slopes, landslide areas, rockslide areas, and avalanche areas (see the Soils, Geologic, and Natural Hazard Areas Map in Attachment G).

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

No significant natural hazards have been identified in the areas planned for Pathway development in El Paso County, including faults and fissures, unstable slopes, landslide areas, rockslide areas, and avalanche areas (see the Soils, Geologic, and Natural Hazard Areas Map in Attachment G).

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

No significant natural hazards have been identified in the areas planned for Pathway development in El Paso County, including faults and fissures, unstable slopes, landslide

areas, rockslide areas, and avalanche areas (see the Soils, Geologic, and Natural Hazard Areas Map in Attachment G).

2.405(4)(d) *Wildfire hazard areas.*

Xcel Energy's facilities are designed, constructed, operated, and maintained to meet or exceed all applicable requirements of the IEEE standards and accepted industry standards and practices including IEEE 979, Guide for Substation Fire Protection. Applicable fire laws and regulations, as outlined in Colorado Revised Statutes 31-15-601, will be observed during construction and normal operation of the transmission line.

Fires along transmission lines are very rare. Xcel Energy's powerlines are monitored and controlled remotely from an operations center where event response is coordinated. In the rare event of an emergency, Xcel Energy will likely be aware of an issue before the general public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999 to report an emergency. Unauthorized personnel, including emergency responders, should not approach the facilities and should not touch the electric lines or anyone or anything in contact with them.

Xcel Energy also coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through the Responding to Utility Emergencies Program. Xcel Energy's Emergency Response Procedures are provided as Attachment H.

2.405(4)(e) *Floodplains.*

The Pathway alignment subject to this Application will cross Federal Emergency Management Agency (FEMA)-designated 100-year floodplains within unincorporated El Paso County associated with Little Horse Creek, Steels Fork Horse Creek, North Fork Horse Creek, Mustang Creek, Horse Creek, West Branch Steels Fork Horse Creek, West Branch, and Pond Creek (see the Water Resources Map, Attachment K). Prior to construction, Xcel Energy will obtain a Floodplain Development Permit for each floodplain crossing from the Pikes Peak Regional Building Department Floodplain Management Office, if necessary.

2.405(5) The Project will not have a significant adverse effect on the capability of local governments affected by the Project to provide local infrastructure and services, or exceed the capacity of service delivery systems. The determination of the effects of the Project on local government services may include but is not limited to the following considerations:

- 2.405(5)(a) *Current and projected capacity of roads, schools, infrastructure, drainage and/or stormwater infrastructure, housing, and other services necessary to accommodate development, and the impact of the Project upon the current and projected capacity.***
- 2.405(5)(b) *Changes caused by the Project in the cost of providing education, transportation networks, water treatment and wastewater treatment, stormwater drainage, channel stabilization, bridges, emergency services, or other governmental services or facilities.***
- 2.405(5)(c) *Need for temporary roads to access the Project for construction and maintenance.***
- 2.405(5)(d) *Change in demand for public transportation.***

No new or upgraded public services or facilities are anticipated to be needed to serve Pathway in El Paso County. Impacts to schools, bus routes, water and wastewater treatment, water supply, emergency services, transportation, and other local infrastructure are not anticipated as a result of Pathway. Construction will generally occur within permanent and temporary easements acquired for Pathway. Prolonged road closures and detours are not anticipated during construction. Traffic control measures may be needed during wire pulling activities; Xcel Energy will obtain the necessary permits from El Paso County and from CDOT, as needed, prior to construction. Impacts to school bus routes are not anticipated. Xcel Energy will negotiate a Development Agreement with El Paso County regarding the use of County Roads during construction and how Xcel Energy will mitigate and repair damage to County Roads caused by construction traffic.

Where feasible, the Pathway route through El Paso County is co-located along existing infrastructure to minimize impacts to the surrounding area (see Existing Transmission Line Map, Attachment N). Approximately 25 miles of the Pathway transmission line in El Paso County are co-located along existing roads and electric transmission

infrastructure. During construction, temporary impacts to local roads will vary day-by-day as the construction moves along the route. Temporary overland access for the transmission line will occur within the acquired Pathway ROW.

2.405(6) The Project will not have a significant adverse effect on the quality or quantity of recreational opportunities and experience. The determination of effects of the Project on recreational opportunities and experience may include but is not limited to the following considerations:

- 2.405(6)(a) *Changes to existing and projected visitor days.***
- 2.405(6)(b) *Changes in quality and quantity of fisheries.***
- 2.405(6)(c) *Changes in instream flows or reservoir levels.***
- 2.405(6)(d) *Changes in access to recreational resources.***
- 2.405(6)(e) *Changes to quality and quantity of hiking, biking, or horseback riding trails.***
- 2.405(6)(f) *Changes to hunting experiences.***
- 2.405(6)(g) *Changes to open space.***
- 2.405(6)(h) *Changes to existing conservation easements.***
- 2.405(6)(i) *Changes to regional or neighborhood parks.***

No recreational resources, including powerline trails, are proposed as a part of Pathway. Pathway will not impact the quality or quantity of recreational opportunities and experiences. No changes to fisheries, reservoir levels, open space, or existing conservation easements are anticipated (see the Land Use and Zoning Map, Attachment F).

2.405(7) The Project will not significantly degrade air quality. The determination of effects of the Project on air quality may include but is not limited to the following considerations:

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

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

Short-term effects are anticipated from a temporary increase in fumes and fugitive dust. The short-term effects are not expected to result in changes to visibility and microclimates and will not violate applicable air quality standards. Xcel Energy will obtain the appropriate construction Air Pollutant Emissions Notice prior to construction if necessary and will follow state standards to control the release of fugitive dust related to construction. During operation, Pathway will not generate trips in excess of those currently experienced as the transmission line will not be staffed. Visits from personnel will be limited to emergencies or maintenance and inspection activities and increased fumes, exhaust and dust during operation is not expected.

2.405(8) The Project will not significantly degrade existing visual quality. The determination of visual effects of the Project may include but is not limited to the following considerations:

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

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

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

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

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

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

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

Pathway's route through El Paso County has been co-located along existing transmission infrastructure and county roads as much as possible to reduce visual impacts (see the Existing Transmission Line Map, Attachment N). Approximately 25

miles of the Pathway transmission line in El Paso County are co-located along existing roads and electric transmission infrastructure. In addition, the weathering steel poles will oxidize to resemble a natural brown look and existing vegetation will be preserved to the extent possible to maintain visual contrast in the landscape. Visual impacts of the transmission line will vary based on proximity and with distance, the scale of the transmission line poles will be minimized. The visual landscape along the route features existing transmission lines, roadways, and industrial elements, and Pathway will result in an incremental increase in structures in the viewshed. Pole Details, Representative Photographs, and Simulations are provided in Attachment J.

2.405(9) The project will not significantly degrade surface water quality. The determination of effects of the Project on surface water quality may include but is not limited to the following considerations:

- 2.405(9)(a)** *Changes to existing water quality, including patterns of water circulation, temperature, conditions of the substrate, extent and persistence of suspended particulates and clarity, odor, color or taste of water.*
- 2.405(9)(b)** *Applicable narrative and numeric water quality standards.*
- 2.405(9)(c)** *Changes in point and nonpoint source pollution loads.*
- 2.405(9)(d)** *Increase in erosion.*
- 2.405(9)(e)** *Changes in sediment loading to waterbodies.*
- 2.405(9)(f)** *Changes in stream channel or shoreline stability.*
- 2.405(9)(g)** *Changes in stormwater runoff flows.*
- 2.405(9)(h)** *Changes in trophic status or in eutrophication rates in lakes and reservoirs.*
- 2.405(9)(i)** *Changes in the capacity or functioning of streams, lakes or reservoirs.*
- 2.405(9)(j)** *Changes to the topography, natural drainage patterns, soil morphology and productivity, soil erosion potential, and floodplains.*
- 2.405(9)(k)** *Changes to stream sedimentation, geomorphology, and channel stability.*
- 2.405(9)(l)** *Changes to lake and reservoir bank stability and sedimentation, and safety of existing reservoirs.*

Construction of the transmission line will not create runoff beyond previous site levels, will not change existing topography, or adversely affect drainage. No alteration in the pattern or intensity of surface drainage will result from the construction or operation of the transmission line. Once construction has been completed, restoration will resume pre-project conditions. A Preliminary Drainage Analysis is provided in Attachment L.

The transmission line will be sited to span floodplains, wetlands, and riparian areas to the extent practicable. Pathway will adhere to BMPs outlined in the SWMP, which will include erosion control and revegetation measures. The transmission line will span or avoid any wetlands, streams, lakes, and reservoirs as possible. Pathway will obtain a Floodplain Development Permit for each FEMA-designated floodplain crossing from the Pikes Peak Regional Building Department Floodplain Management Office, and conditions of approval will be followed during construction. No surface water quality impacts are anticipated.

2.405(10) The Project will not significantly degrade groundwater quality. The determination of effects of the Project on groundwater quality may include but is not limited to the following considerations:

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

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

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

Pathway will not impact aquifers or wells. Pathway design and construction will mitigate impacts to groundwater contamination to the extent practicable.

Pathway will not generate pollutant loads during construction or operation therefore no long-term impacts to groundwater will occur. Construction of the transmission line will not create runoff in excess of previous site levels and will not change existing topography or adversely affect drainage. A Preliminary Drainage Analysis is provided in Attachment L.

2.405(11) The Project will not significantly degrade wetlands and riparian areas, terrestrial or aquatic plant or animal life. The determination of effects of the Project on these areas shall include the considerations raised in the applicable federal and/or state Permits.

Pathway design and construction will mitigate impacts to wetlands and other surface and groundwater contamination to the extent practicable. Potential Waters of the U.S. (WOTUS) will be avoided to the extent practicable. The span between transmission line

poles can be sited to avoid placement within sensitive areas and span across wetlands and other WOTUS features to avoid permanent impacts (see the Water Resources Map, Attachment K). Pathway is not anticipated to result in any permanent impacts to wetlands or other WOTUS features. Construction of the transmission line will not create runoff in excess of previous site levels and will not change existing topography or adversely affect drainage. There will be no alteration in the pattern or intensity of surface drainage or any impacts to lakes or reservoirs as a result of construction or operation of the transmission line. Sensitive natural resource areas, including wetlands and critical habitats for wildlife, were specifically considered as part of the routing and siting analysis when identifying the preferred location for the transmission line to minimize potential interference from Pathway facilities (see the Routing and Siting Study for Segment 5, Attachment C). Xcel Energy has communicated with Colorado Parks and Wildlife and U.S. Fish and Wildlife Service (USFWS) representatives regarding Pathway and will continue to coordinate with them throughout design and construction of Pathway and comply with all applicable regulatory requirements. Pathway will obtain a Floodplain Development Permit for each FEMA-designated floodplain crossing from the Pikes Peak Regional Building Department Floodplain Management Office, if necessary. Pathway will adhere to BMPs outlined in the SWMP, which will include erosion control and revegetation measures.

2.405(12) The Project will not significantly deteriorate soils and geologic conditions. The determination of effects of the Project on soils and geologic conditions may include but is not limited to the following considerations:

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

2.405(12)(b) Changes in soil erodibility

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

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

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

2.405(12)(f) Waterlogging

2.405(12)(g) Soil morphology and productivity

No significant natural hazards have been identified in the areas planned for Pathway development in El Paso County (see the Soils, Geologic, and Natural Hazard Areas Map, Attachment G). Professional engineers do not foresee any unusual risks. Pathway will be constructed based on the result of geotechnical studies to effectively site

transmission poles and avoid geological hazards. During construction, Xcel Energy's contractor will minimize any soils impacts by strictly adhering to a SWMP regulated by Colorado Department of Public Health and Environment and will institute and maintain erosion and sediment control BMPs designed to protect soils and prevent erosion.

2.405(13) The Project will not cause a nuisance. The determination of nuisance effects of the Project may include but is not limited to the following considerations: increase in odors, dust, fumes, glare, heat, noise, vibration or artificial light.

Nuisance vibrations, odors, glare, artificial light, and heat are not anticipated during construction or operation of Pathway. Short-term effects are anticipated from a temporary increase in construction vehicles which may increase dust and fumes. These are not expected to cause a public nuisance. Construction activities will comply with the maximum permissible noise levels for construction activities specified in Section 5 of the El Paso County Noise Ordinance (El Paso County 2002). The Noise and EMF Study is provided as Attachment E. The projected noise levels from the Pathway transmission line were deemed reasonable by the CPUC and not subject to further review. The CPUC Decision for a CPCN for Pathway is provided as Attachment S.

2.405(14) The Project will not result in unreasonable risk of releases of hazardous materials. The determination of the risk of release of hazardous materials caused by Project may include but is not limited to the following considerations:

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

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

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

No hazardous materials will be permanently used, stored, or generated on site of Pathway facilities. Pathway will not require transportation of hazardous materials. Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances. Construction activities will be performed using methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. Activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment. In the rare

event of a fire emergency, Xcel Energy will likely be aware of an issue before the general public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999. In the event of an outage or equipment failure, the affected equipment is immediately de-energized and Xcel Energy personnel are dispatched to the site. Xcel Energy personnel receive safety training for emergency situations relating to high-voltage electrical equipment. Xcel Energy will coordinate with each Fire District crossed by Pathway in El Paso County. Copies of the Fire District Coordination Letters are provided in Attachment T. Emergency Response Procedures are provided as Attachment H.

2.405(15) Urban development, population densities, and site layout and design of storm water and sanitation systems shall be accomplished in a manner that will prevent the pollution of aquifer recharge areas. The determination of potential for pollution of the aquifer recharge areas by the Project may include but is not limited to the following considerations:

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

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

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

Pathway is not an urban development project and will not require permanent storm water or sanitation systems in El Paso County. Pathway will not impact aquifers (see response to 2.405.10).

2.405(16) The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project, or to comply with regulatory or technological requirements. The determination of whether the Project is reasonably necessary may include but is not limited to the following considerations:

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

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

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

The purpose of Pathway is to create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals. Pathway is a backbone transmission system that will connect generation sources in eastern Colorado to demand throughout Colorado. The current electric transmission facilities in the Eastern Plains do not have adequate capacity to meet the forecasted demand. Facilities in El Paso County are part of the larger Pathway that creates a transmission "loop" to provide additional transmission capacity. Pathway will be able to integrate approximately 6,500 megawatts of electric power output from new generation sources.

Colorado's Power Pathway supports the state-mandated goal of an 80% reduction in carbon emissions by 2030, which all electric utilities are required to comply with. Colorado has an open transmission system, so Xcel Energy's transmission lines also carry electricity generated by other utilities and cooperatives around the state, benefitting everyone who uses electricity. All transmission providers in Colorado will have access to Colorado's Power Pathway to deliver clean, renewable energy to its customers, who will still be serviced by their current power provider. Because Colorado's open transmission system carries electricity generated by multiple utilities that is distributed to homes and businesses by local power companies, both electric utilities and electricity users around the state benefit from this Project. The design and need of Pathway have been approved by the CPUC and represents the use and application of best technology and industry standards for transmission and transformation of electric energy. The CPUC Decision for a CPCN for Pathway is provided as Attachment S.

All necessary land use, environmental, and construction permits, approvals, and authorizations will be obtained prior to construction as required, and BMPs will be implemented.

2.405 References

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