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Subject: Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report

1.0 BACKGROUND

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy), proposes to construct, maintain, and operate Colorado's Power Pathway (Pathway) in eastern Colorado. Pathway is a \$1.7 billion investment proposed by Xcel Energy to improve the state's open, interconnected electric grid and enable future renewable energy development around the state. Pathway includes:

- Installation of approximately 550 miles of new 345-kilovolt (kV) double-circuit transmission line in 12 counties;
- Construction of four new electric substations (Canal Crossing, Goose Creek, May Valley, and Sandstone); and
- Expansion, equipment additions, or equipment upgrades at four existing electric substations (Fort St. Vrain, Pawnee, Harvest Mile, and Tundra).

Pathway will be constructed in five segments. Segment 5 includes approximately 124 miles of new 345-kV double-circuit electric transmission line within a 150-foot-wide right-of-way (ROW), as well as permanent and temporary easements required for access during construction and for operation and maintenance and temporary construction areas during construction. Segment 5 will be constructed within five counties: Arapahoe, Elbert, El Paso, Lincoln, and Pueblo.

Pathway facilities proposed in Arapahoe County include approximately 18 miles of new 345-kV double-circuit electric transmission line (note 1 mile is located with the City of Aurora and was approved by the City of Aurora separately). Proposed activities in Arapahoe County will also include seeking approval of all temporary construction areas (TCA) associated with construction of the Pathway facilities for the duration needed to complete Pathway construction. Pathway will be constructed in segments, with portions of Segment 5 proposed to be located in Arapahoe County.

As part of its environmental due diligence, Xcel Energy contracted Tetra Tech, Inc. (Tetra Tech) to conduct resource evaluations for biological resources, wetlands, streams, Waters of the United States (WOTUS), and Colorado State Waters on parcels crossed by the Pathway transmission line ROW along Segment 5. The primary objective of the resource evaluations was to field-evaluate (where access was available) and map any sensitive wildlife or plant species habitat, wetlands or waters identified through online resources to determine if impacts were anticipated during construction activities, and in those areas initiate avoidance and mitigation measures. Desktop assessments using applicable online resources were conducted prior to field evaluations. Field evaluations included pedestrian surveys within the Pathway transmission line ROW (where access was available) targeting specific areas containing potential aquatic resources identified from the desktop assessment.

This report provides the methods and results of biological resources and wetlands, State waters, and WOTUS desktop assessments and field survey results for the Pathway transmission line alignment (where access was available) in unincorporated Arapahoe County. This report also provides proposed mitigation measures for biological resources and wetlands, State Waters, and WOTUS that will be implemented during pre-construction, construction, and operation of Pathway in Arapahoe County. This report also provides a summary of Xcel Energy's meetings with Colorado Parks and Wildlife (CPW) and U.S. Fish and Wildlife Service (USFWS) to discuss Pathway facilities in Segment 5, survey protocol, and mitigation measures.

2.0 BIOLOGICAL RESOURCES

2.1 Desktop Assessment

A desktop analysis of the portion of Pathway within Arapahoe County was completed to characterize the environmental setting of Pathway and evaluate the potential for occurrence of special-status species based on available habitat. The analysis included the transmission line route plus a 1-mile buffer. The 1-mile buffer also included the Harvest Mile Substation. The 1-mile buffer was used to evaluate biological resources that could be influenced by project construction or operation (e.g., raptor nests). To assess the potential for occurrence of special-status species within the county, the following publicly available information was reviewed:

- Google Earth Aerial Imagery (Google 2025)
- National Land Cover Database (USGS 2024)
- USFWS Information for Planning and Consultation (IPaC) online tool (USFWS 2025b)
- USFWS Critical Habitat Portal (USFWS 2025c)

- Colorado Natural Heritage Program Species Elements Database (CNHP 2025)
- CPW Species Activity Mapping Data (CPW 2025a)
- CPW State Species List (CPW 2025b)
- Online species profiles and distribution information (CPW 2025c)

Figure 1, Arapahoe County - CPW Select Species Map, shows the CPW-designated habitat within Arapahoe County.

The USFWS IPaC online tool and CPW online databases were used to identify federally and state-protected species that may occur near Pathway facilities in Arapahoe County, including species listed or proposed for listing under the Endangered Species Act, bald and golden eagles protected under the Bald and Golden Eagle Protection Act, and state-listed threatened or endangered species (CPW 2025a, CPW 2025b, CNHP 2025, USFWS 2025c). In addition to the federally and state-listed species that receive regulatory protection, state Species of Concern (SC) were also evaluated. Although SC species do not receive any regulatory protection, they have been identified by the state as having management interest either due to declining populations or habitat loss.

Figure 1, Arapahoe County - CPW Select Species Map, illustrates mapped special-status wildlife and avian habitat in Arapahoe County. A total of 15 special-status wildlife species were identified as potentially occurring within 1 mile of proposed Pathway facilities in Arapahoe County. Table 1 outlines the likelihood of occurrence of each species based upon review of known species ranges, habitat requirements, land cover data, and aerial imagery.

Table 1: Special-Status Species Potentially Occurring within 1 Mile of Proposed Pathway Facilities in Arapahoe County

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Mammals				
Black-tailed prairie dog	<i>Cynomys ludovicianus</i>	- / SC	Occurs in the eastern third of Colorado, in shortgrass prairie habitat below 6,000 feet elevation. The species lives in colonies and they construct burrows where they live and raise their young. 1-mile buffer of proposed Pathway facilities is within the overall species range and high potential colony occurrence area (CPW 2025a).	High
Gray wolf	<i>Canis lupus</i>	FE / SE	Requires large areas of contiguous habitat, including forests and mountain terrain, with an abundance of prey and cover. The species has been considered extirpated from Colorado until very recently and is not known to occur east of I-25.	Unlikely

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Preble's meadow jumping mouse	<i>Zapus hudsonius preblei</i>	FT/ ST	Riparian vegetation with adjacent, preferably undisturbed grassland and nearby water sources. 1-mile buffer of proposed Pathway facilities is within mapped overall range; however, the nearest mapped occupied habitat occurs approximately 6 miles south in Elbert County (CPW 2025a).	Low
Swift fox	<i>Vulpes velox</i>	- / SC	Occurs in shortgrass prairie habitat with flat or rolling terrain and high visibility over long distances, up to 7,000 feet elevation. 1-mile buffer of proposed Pathway facilities within overall species range (CPW 2025a).	Moderate
Birds				
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA / SC	Large rivers, lakes, and reservoirs with an abundance of fish. Nesting is typically in large trees close to water. The 1-mile buffer of proposed Pathway facilities is located within overall species range. A previously CPW-mapped active nest site is mapped approximately 0.8 miles north of the proposed Pathway facilities. The proposed Pathway facilities and 1-mile buffer are located within a bald eagle winter concentration area and winter forage.	High
Ferruginous hawk	<i>Buteo regalis</i>	- / SC	Occurs in arid and open habitats including grasslands, sagebrush or saltbush plains, and deserts. Nests in lone trees, cliffs, rock outcrops, or on the ground in a high area like a knoll. 1-mile buffer of proposed Pathway facilities within species breeding range.	Moderate
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA / -	Open native habitats with an abundance of prey. Nesting occurs on cliffs, knolls, and raised areas. 1-mile buffer of proposed Pathway facilities within overall species range.	Moderate
Piping plover ³	<i>Charadrius melodus</i>	FT / ST	Reservoirs, lakes, and rivers with sand and gravel areas and sparse vegetation. 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – No downstream impacts anticipated.
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	- / ST	Open habitats with low or sparse vegetation on gently sloping terrain. Nesting typically occurs in small mammal burrows. Often found nesting in the perimeters of prairie dog colonies. 1-mile buffer of proposed Pathway facilities occurs in species breeding range and high potential prairie dog colony occurrence area.	Moderate
Whooping crane	<i>Grus americana</i>	FE / SE	Freshwater marshes, wet prairies, shallow lakes, and lagoons. 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – This species has not been observed in Colorado since 2010.
Fish				
Pallid sturgeon ³	<i>Scaphirhynchus albus</i>	FE / -	Large river systems with firm sandy bottoms (i.e., Missouri River). 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – No downstream impacts anticipated.
Reptiles				
Common gartersnake	<i>Thamnophis sirtalis</i>	- / SC	Occurs in grasslands, prairies, streams, wetlands, and is often found near water. 1-mile buffer of proposed Pathway facilities within overall species range.	Moderate
Insects				

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Monarch butterfly	<i>Danaus plexippus</i>	FPT / -	Found in a wide variety of habitats and are known to occur in grasslands and prairie habitats in Colorado. The species requires milkweed (<i>Asclepias</i> spp.) host plants to lay their eggs.	Moderate
Plants				
Ute ladies'-tresses orchid	<i>Spiranthes diluvialis</i>	FT / -	Moist meadows associated with perennial stream terraces, floodplains, and oxbows at elevations below 6,500 feet.	Low
Western prairie fringed orchid	<i>Platanthera praeclara</i>	FT / -	Unplowed, calcareous tallgrass prairies and sedge meadows.	Unlikely- 1-mile buffer of proposed Pathway facilities outside range for the species. Suitable habitat is not present within 1-mile of Pathway facilities in Arapahoe County.

1 FPT = Federal Proposed Threatened (not protected under the ESA), FE = Federally Endangered, FT = Federally Threatened, ST = State Threatened, SE = State Endangered, SC = State Species of Concern

2 Likelihood of Occurrence: Unlikely—unsuitable habitat in project and vicinity; Low—marginally suitable habitat in project and vicinity; Moderate—suitable habitat present in project, or species known to occur in habitat similar to project; High—highly suitable habitat present in project, or known populations exist in project vicinity.

3 Platte River Species = Water-related activities or uses in the Platte River Basins may affect these species in downstream reaches.

As shown in Figure 1, the proposed route in Arapahoe County crosses a portion of swift fox, ferruginous hawk, and common garter snake overall range as mapped by CPW (CPW 2025a). The entirety of the proposed route in Arapahoe County overlaps black-tailed prairie dog high-potential colony occurrence range, Preble's meadow jumping mouse overall range, golden eagle breeding range, and burrowing owl breeding range (CPW 2025a).

In addition to listed species, CPW tracks and maps data for big game species habitat throughout the state (CPW 2025a). Figure 1 illustrates mapped big game habitat in Arapahoe County. Mountain lion (*Puma concolor*) overall range and peripheral range is located within the 1-mile buffer of proposed Pathway facilities. Three mule deer (*Odocoileus hemionus*) concentration areas, one migration corridor, four severe winter ranges, one winter concentration area and three areas identified as winter range occur within the 1-mile buffer of proposed Pathway facilities. Two pronghorn antelope (*Antilocapra americana*) concentration areas, one winter concentration area, one area identified as winter range, and pronghorn perennial water sources occur within the 1-mile buffer of proposed Pathway facilities. Two white-tailed deer (*Odocoileus virginianus*) concentration areas and two areas identified as winter range occur within the 1-mile buffer of proposed Pathway facilities. No other big game species habitat is mapped in the same area (CPW 2025a).

A total of 2 special-status plant species were identified as potentially occurring within 1 mile of proposed Pathway facilities in Arapahoe County. As described in Table 1, the likelihood of occurrence of the Ute ladies'-tresses orchid within 1 mile of Pathway facilities in Arapahoe County is low and the

likelihood of occurrence of the Western prairie fringed orchid within 1 mile of Pathway facilities in Arapahoe County is unlikely.

2.2 Field Surveys

In addition to publicly available information, windshield and ground-based surveys of proposed Pathway facility locations have been completed since September 2021 until present (where access was available) to identify any potential areas of concern for biological resources and identify habitat for special status species listed in Table 1. Ground-based raptor nest surveys and aerial raptor nest surveys were conducted in April and May 2022 to identify potentially active eagle and other raptor nests within 0.5-mile of the proposed transmission line route and the Harvest Mile Substation. Ground based raptor nest surveys along Segment 5 of Pathway have been ongoing since the initial aerial raptor nest surveys in 2022. Every nesting season since 2022, Tetra Tech biologists have performed ground-based raptor nest surveys to account for changes in the transmission line alignment and newly acquired property access, as well as to verify the presence and activity of previously mapped nests and document newly constructed nests. Since May of 2022, burrowing owl habitat/prairie dog colony surveys have also been completed along the ROW of Segment 5 where landowner access has been granted. Biologists have made an effort to document potential swift fox dens observed during these surveys but have yet to encounter any. Surveys for nesting raptors, burrowing owls, and other ground nesting birds will continue to be conducted in areas with suitable nesting habitat prior to the construction phase of Pathway. Surveys to assess areas for suitable Preble's meadow jumping mouse habitat and Ute-ladies' tresses habitat were completed in October of 2023 and determined that suitable habitat for both species was not present along Segment 5 within Arapahoe County.

The field-verified raptor nests and suitable burrowing owl habitat identified within and adjacent to the transmission line ROW as of the date of this report are shown on Figure 2, Arapahoe County Sheet Maps.

2.3 Proposed Mitigation Measures for Biological Resources

Special Status Plant Species

Regarding special status plant species, surface waters, riparian areas, and wetlands in areas less than 1,400 feet wide at the crossing will be spanned, therefore impacts to the Ute ladies'-tresses orchid are not anticipated. As described in Table 1, impacts to the Western prairie fringed orchid are not anticipated because the 1-mile buffer of proposed Pathway facilities is outside the range for the species and no downstream impacts are anticipated. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall

vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to erosion and sediment control best management practices (BMPs) outlined in the Pathway Stormwater Management Plan (SWMP), which will include erosion control and revegetation measures.

Mule Deer

To avoid or minimize potential project impacts to Mule Deer Severe Winter Range and Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the December 1st to April 30th timeframe. If this cannot be achieved, construction activities will start outside of the winter timing within Mule Deer Severe Winter Range as requested by CPW. To avoid or minimize potential project impacts to Mule Deer Migration Corridors, access roads and linear routes will be kept under 1 linear mile per each square mile of habitat that intersects Pathway. To avoid or minimize potential project impacts to Pronghorn Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the January 1st to April 30th timeframe. If this cannot be achieved, these activities will begin outside the winter timing as requested by CPW.

Swift Fox

To avoid or minimize potential project impacts to swift fox, Xcel Energy will conduct preconstruction surveys for active swift fox den sites along the Pathway right-of-way and other areas of disturbance within swift fox overall range. If active swift fox den sites are observed, no human encroachment, surface disturbance, or construction activity will occur within 0.25 miles of an active maternal den site from March 15 through June 15, where feasible.

Migratory Birds and Raptors

Pathway has been sited to avoid known eagle nest and roost locations to the extent practicable. Xcel Energy is a member of Avian Power Line Interaction Committee (APLIC) and the transmission line will be designed in accordance with the "Suggested Practices for Avian Protection on Power Lines, the State of the Art in 2024" (APLIC 2024) and "Reducing Avian Collisions with Power Lines: The State of the Art in 2012" (APLIC 2012). Bird flight diverters or other marking devices will be used in select areas based on CPW's prior recommendations.

CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable. To avoid or minimize potential project impacts to migratory birds and raptors, including eagles,

Pathway will conduct tree/vegetation clearing during the nonbreeding season for birds (September 1 through April 15) if feasible. If vegetation clearing cannot occur during the nonbreeding season, vegetation clearance surveys, raptor nest surveys, and burrowing owl surveys may be conducted per USFWS and CPW guidance to identify avian nesting activity and determine appropriate avoidance buffers (CPW 2020, CPW 2021) or monitor active nest sites until determined to be inactive. All project construction activities will implement appropriate CPW avoidance buffers around active raptor nests to the extent practicable (CPW 2020). If construction activities must occur inside CPW recommended buffers of an active raptor nest, a qualified biologist will be assigned to monitor the active raptor nest during project construction to ensure nesting raptors do not become disturbed and abandon their nest.

3.0 WETLANDS AND WATERS OF THE U.S.

3.1 Desktop Assessment

Tetra Tech conducted a desktop assessment of the entire Segment 5 transmission line ROW to identify potential jurisdictional wetlands, WOTUS, and other State Waters that may be present using the following data sources:

- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FEMA 2024)
- Google Earth Aerial Imagery (Google Earth 2025)
- U.S. Fish and Wildlife Service National Wetland Inventory (NWI) dataset (USFWS 2025)
- U.S. Geologic Survey National Hydrology Dataset (NHD) (USGS 2023)

Using this information, Tetra Tech mapped desktop-assessed potential wetlands and waterbodies utilizing Google Earth Aerial Imagery and ArcGIS Software. Boundaries of potential wetlands or waterbodies were mapped conservatively, later to be evaluated in the field by Tetra Tech wetland scientists. It should be noted that NWI and NHD data are mapped using high-altitude aerial imagery and are sometimes inaccurate due to age of the imagery, timing of image capture, and scale of the imagery, and are therefore used only as a guide for the location of likely wetlands and streams. The presence of an NWI wetland or NHD flowline on aerial imagery does not always indicate the presence of a wetland or stream.

3.2 Wetland Evaluation Methods

Tetra Tech evaluated potential wetland areas (where access was available) by documenting general observations on dominant vegetation, soil characteristics, and hydrology in areas of interest (i.e., areas with potential intersections between the transmission line ROW and potential wetland and

streams). For a site to be considered a wetland, there must be a dominance of hydrophytic vegetation, hydric soils, and characteristic wetland hydrology. In normal conditions, if an area lacks any one of these three criteria, it is not considered a wetland.

3.3 Other Waterbody Evaluation Methods

Non-wetland potential WOTUS and State Water features are also regulated under the Clean Water Act and House Bill 24-1379 (Regulation 87) for dredge or fill activities that may be caused by construction. For Pathway, the wetland scientists assessed and mapped stream features by following the ordinary high-water mark (OHWM). The USACE defines the OHWM as the following (33 Code of Federal Regulations 328.3(e); USACE 2023):

...that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

3.4 Unincorporated Arapahoe County Wetlands and Other Waterbody Field Evaluation Results

Tetra Tech wetland scientists conducted site visits within areas where land access has been granted to Xcel Energy to perform wetland evaluations and jurisdictional stream determinations within the transmission line ROW. The site visits were conducted in unincorporated Arapahoe County in October 2023, February 2024, July 2024, April 2025, and November 2025. The field-verified wetlands are shown on Figure 2, Arapahoe County Sheet Maps.

3.5 Proposed Mitigation Measures for Wetlands and Waters of the U.S.

Pathway will avoid impacts to wetlands, State Waters, and WOTUS features. Xcel Energy will require their construction contractor to implement BMPs during construction. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to BMPs outlined in the SWMP, which will include erosion control and revegetation measures. Temporary impacts to wetlands, State Waters, and WOTUS during construction of Pathway will be avoided. In areas where access roads are not planned to cross a wetland or stream and crossing of a wetland or stream is not necessary for Pathway construction, driving access will be restricted by installing high-visibility construction fencing as a visual aid to prohibit construction subcontractors from driving through aquatic features in order to avoid impacts to potentially jurisdictional wetlands, State Waters, and WOTUS.

Figure 2 depicts the Pathway preliminary structure locations, access roads, and temporary pull site locations within the proposed 150-foot ROW of the preferred transmission route; and includes the field-verified wetlands. A description of the mitigation measures proposed in specific locations in unincorporated Arapahoe County where the Pathway transmission line ROW is located near field-verified wetlands is provided in the subsequent sections.

Harvest Mile Substation

As shown in Figure 2, Sheet 1, a field-verified wetland is located in the proposed transmission line ROW into Harvest Mile Substation west of S Harvest Road. The transmission line access road will not cross this wetland, as the existing access driveway to the Harvest Mile Substation will be used. The transmission line access road avoids this field-verified wetland, as access to pole 701 will come due east from Harvest Road and access to pole 702 will come southwest from the existing access road to the substation; no downline access will be permitted in this area. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into this wetland. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Senac Creek

As shown in Figure 2, Sheet 5, a field-verified wetland is associated with Senac Creek between poles 690 and 691. The transmission line access road will not cross Senac Creek. The access to pole 691 will be off E Quincy Avenue to the north. Access to pole 690 will be via downline access between poles 689 and 690. No downline access will be allowed between poles 690 and 691. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into Senac Creek. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Black Shack Creek

As shown in Figure 2, Sheet 8, a field-verified wetland (which is a State Water) is associated with Black Shack Creek between poles 682 and 683. The transmission line access road will not cross Black Shack Creek. The access to pole 683 will be off E Quincy Avenue. Access to pole 682 will be via downline access between poles 681 and 682. No downline access will be allowed between poles 682 and 683. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into Black Shack Creek. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Coal Creek

As shown in Figure 2, Sheets 9 and 10, a field-verified wetland (which is a State Water) is associated with Coal Creek between poles 677 and 678. The transmission line access road will not cross Coal Creek. The access to pole 677 will be off of E Quincy Avenue. Access to pole 678 will be via downline access between poles 679 and 678. No downline access will be allowed between poles 677 and 678. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into Coal Creek. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 665

As shown in Figure 2, Sheet 14, a field-verified wetland is associated with an unnamed drainage near pole 665. The transmission line access road will not cross this field-verified wetland. The access to pole 665 will be via downline access between poles 666 and 665. No downline access will be allowed between poles 665 and 664. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into this drainage. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Box Elder Creek

As shown in Figure 2, Sheets 17 and 18, a field-verified wetland (which is a State Water) is associated with Box Elder Creek between poles 651 and 652. The transmission line access road will not cross Box Elder Creek. The access to poles 651 and 652 will be off of E Quincy Avenue. No downline access will be allowed between poles 651 and 652. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into Box Elder Creek. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 643

As shown in Figure 2, Sheet 21, a field-verified wetland is associated with an unnamed drainage near pole 643. The access to pole 643 will be via downline access between poles 644 and 643. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into the unnamed drainage. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 608

As shown in Figure 2, Sheet 35, a field-verified wetland is associated with an unnamed drainage near pole 608. The field-verified wetland is located on the western edge of the transmission line ROW and does not traverse the entire width of the ROW. The access to pole 608 will be via downline access along the transmission line ROW. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into the unnamed drainage. High-visibility construction fencing will be placed around the field-verified wetland as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 603

As shown in Figure 2, Sheets 37 and 38, a field-verified wetland is associated with an unnamed drainage in between poles 603 and 604. Access between poles 603 and 604 will be via the existing two-track road in this area. The existing two-track road does not cross wetlands, State Waters, or WOTUS features. No downline access will be allowed between poles 603 and 604. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into the unnamed drainage. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 596

As shown in Figure 2, Sheet 40, a field-verified wetland is associated with an unnamed drainage between poles 596 and 597. Access to pole 596 will be off County Road 194 and Antelope Drive. Access to pole 597 will be via downline access between poles 597 and 598. No downline access will be allowed between poles 596 and 597. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into the unnamed drainage. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

Drainage Near Pole 595

As shown in Figure 2, Sheet 41, a field-verified wetland is associated with an unnamed drainage between poles 595 and 596. Access to pole 596 will be off County Road 194 and Antelope Drive. Access to pole 595 will be via downline access between poles 594 and 595. No downline access will be allowed between poles 595 and 596. Erosion control BMPs will be used during construction to minimize potential stormwater runoff into the unnamed drainage. High-visibility construction fencing will be placed across the ROW as a visual aid to remind construction subcontractors that driving through the aquatic feature is prohibited.

4.0 COORDINATION WITH COLORADO PARKS AND WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE

Pathway has been conducting ongoing coordination with CPW and USFWS regarding potential biological resources that may be impacted by Pathway. Pathway had a project introduction meeting with CPW on December 12, 2021, followed by a routing workshop on January 10, 2022, and a follow-up routing discussion on April 22, 2022. On May 9, 2022, Pathway had a project introduction meeting with USFWS. The feedback received from CPW and USFWS during these meetings has been used to inform the routing and siting of Pathway.

Xcel Energy met with Carolyn Craveiro, Lexi Hamous-Miller, Casey Westbrook, and Tim Kroening of CPW on June 10, 2025, to discuss CPW referral agency comments to several of the Pathway Segment 5 permit applications that were ongoing at that time, including CPW's referral agency comments to the Arapahoe County 1041 Application. A summary of the discussion with CPW as related to Pathway facilities in Arapahoe County is provided in the subsequent text. The discussion as relevant to Arapahoe County included the following topics: biological survey approach, Aquatic Native Species Conservation Waters, and swift fox den sites. During the June 10, 2025, meeting, CPW confirmed that the approaches that Xcel Energy is implementing on Pathway are acceptable. On November 4, 2025, Tetra Tech spoke with Lexi Hamous-Miller, CPW Northeast Region Land Use Coordinator (the CPW Northeast Region includes Arapahoe County). On November 5, 2025, Tetra Tech sent a letter to CPW representatives Matt Martinez, Area 5 Wildlife Manager; Tim Kroening, Area 14 Wildlife Manager; Carolyn Craveiro, Southeast Region Land Use Specialist; Lexi Hamous-Miller, Northeast Region Land Use Coordinator; and Casey Westbrook, District Wildlife Manager; and requested that Lexi Hamous-Miller confirm the approach captured in the letter. On November 7, 2025, Lexi Hamous-Miller responded confirming the approach Xcel Energy is taking related to biological issues for Pathway.

Biological Survey Approach

The biological survey approach is that of a rolling survey schedule throughout the year. For example, during preconstruction surveys for burrowing owl, a prairie dog burrow may be empty, but biologists stay in the active construction area to monitor the prairie dog burrows in case the burrows become occupied by burrowing owl. Construction of Pathway has been underway since 2023, and this rolling survey schedule has been executed successfully.

CPW confirmed this approach and requested that Xcel Energy share data regarding field observations to assist CPW in refining high priority habitats and identifying locations where new nests and dens occur, both of which support future referral agency comments for other permit applications. Xcel Energy agreed to provide biological survey results to CPW as they are available.

Aquatic Native Species Conservation Waters

Xcel Energy's design for Pathway prioritized avoiding aquatic resources within the CPW-recommended 500-foot buffer of Aquatic Native Species Conservation Waters. Xcel Energy noted that the typical span of the Pathway transmission line between structures is 950 to 1,400 feet. Xcel Energy avoided Aquatic Native Species Conservation Waters by spanning these resources and putting the transmission line structures outside the 500-foot buffer, where practicable. There were instances where avoidance was not feasible due to spanning limitations, and structures had to be placed within the 500-foot buffer. There are a total of 2 pole locations in Arapahoe County that are sited within 500 feet of an Aquatic Native Species Conservation Water (poles 652 and 677). Neither pole is located inside the ordinary high-water mark of an Aquatic Native Species Conservation Water, with each of these poles located at least 380 feet from the ordinary high-water mark of the nearest Aquatic Native Species Conservation Water. In the instances where the structures must be placed within the 500-foot buffer of an Aquatic Native Species Conservation Water, Xcel Energy confirmed that appropriate best management practices will be implemented in compliance with Colorado stormwater and related requirements.

Swift Fox Den Sites

Xcel Energy asked CPW for information regarding swift fox den sites or concerns relative to swift fox surveys. CPW confirmed no additional information is available beyond the mapped data available online. Xcel Energy agreed to conduct swift fox den surveys in areas within swift fox overall range in coordination with CPW. CPW also recommends no human encroachment, surface disturbance, or construction activity within 0.25 miles of an active maternal den site from March 15 through June 15.

5.0 CONCLUSION

Construction and operation of Pathway is not anticipated to impact biological resources or wetlands and WOTUS. Poles and access roads have been sited to avoid wetlands, State Waters, and WOTUS. BMPs will be implemented during construction and operation to avoid and minimize impacts to water resources and wildlife habitat. Field surveys will continue as access is granted and to evaluate and monitor sensitive resources identified near the Pathway facilities prior to and during construction. Pathway will continue to coordinate with CPW and USFWS through permitting, construction, and operation of the project, as needed, to ensure compliance with all applicable federal and state regulations.

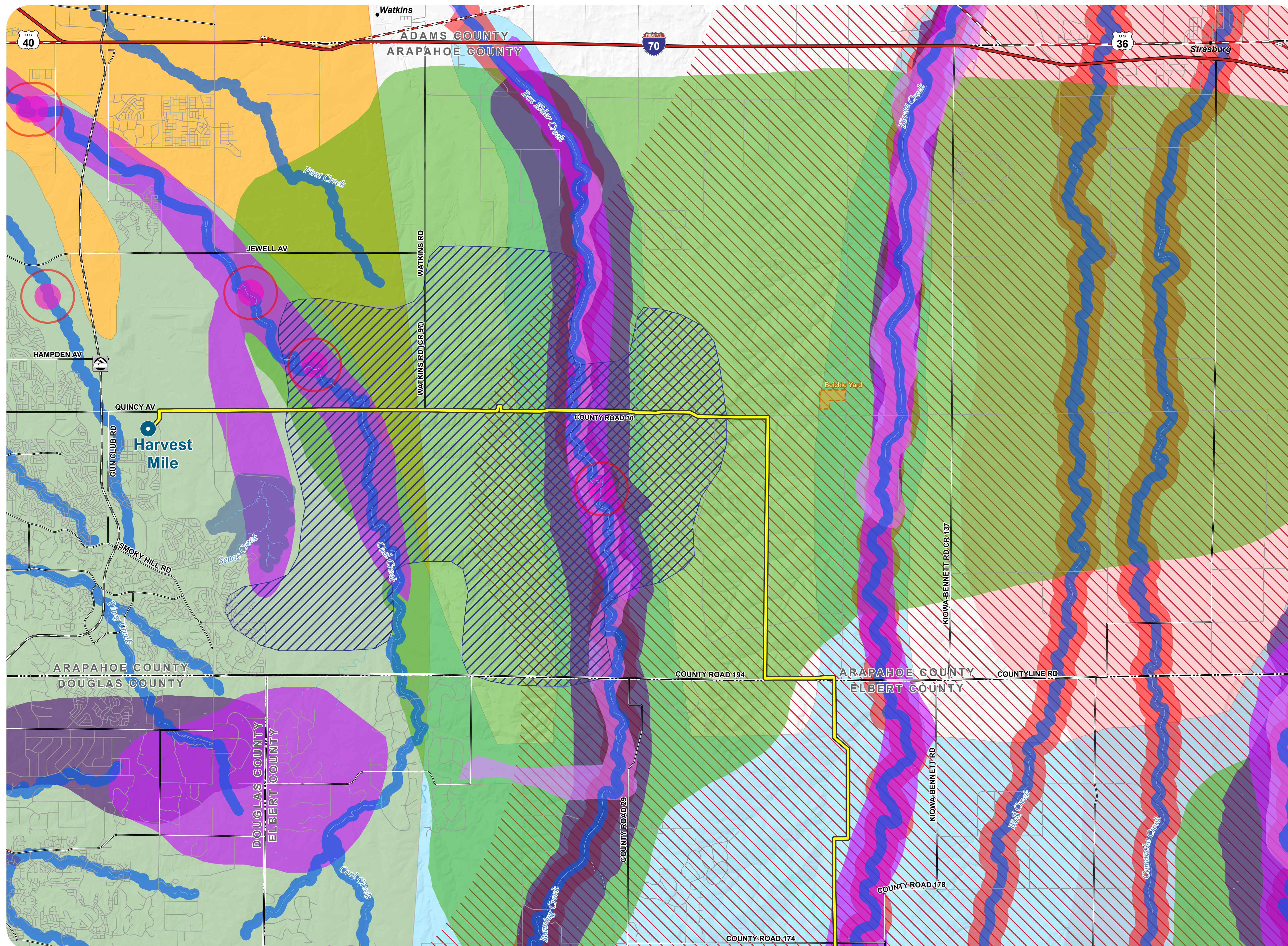
6.0 REFERENCES

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FIGURES

**FIGURE 1:
ARAPAHOE COUNTY - CPW SELECT SPECIES MAP**

COLORADO'S POWER PATHWAY



Legend

-  Existing Substation
 Proposed Transmission Route
 Proposed Laydown Yard

Wildlife Species Habitat*
(CPW 2024)

-  Ferruginous Hawk Breeding Range
-  Swift Fox Overall Range
-  Mountain Plover Breeding Range
-  White Tail Deer Concentration & Winter Range
-  Mountain Lion Overall & Peripheral Range
-  Mountain Plover Breeding Range
-  Common Garter snake Overall Range

Rule 1202.c No Surface Occupancy Habitat

-  Aquatic Native Species Conservation Waters HPHC
 Aquatic Sportsfish Management Waters HPHC
 Bald Eagle Active Nest Site HPHC

Rule 1202.d Density Habitat

-  Mule Deer Severe Winter Range HPHD
 Mule Deer Winter Concentration Area HPHD
 Pronghorn Winter Concentration HPHD

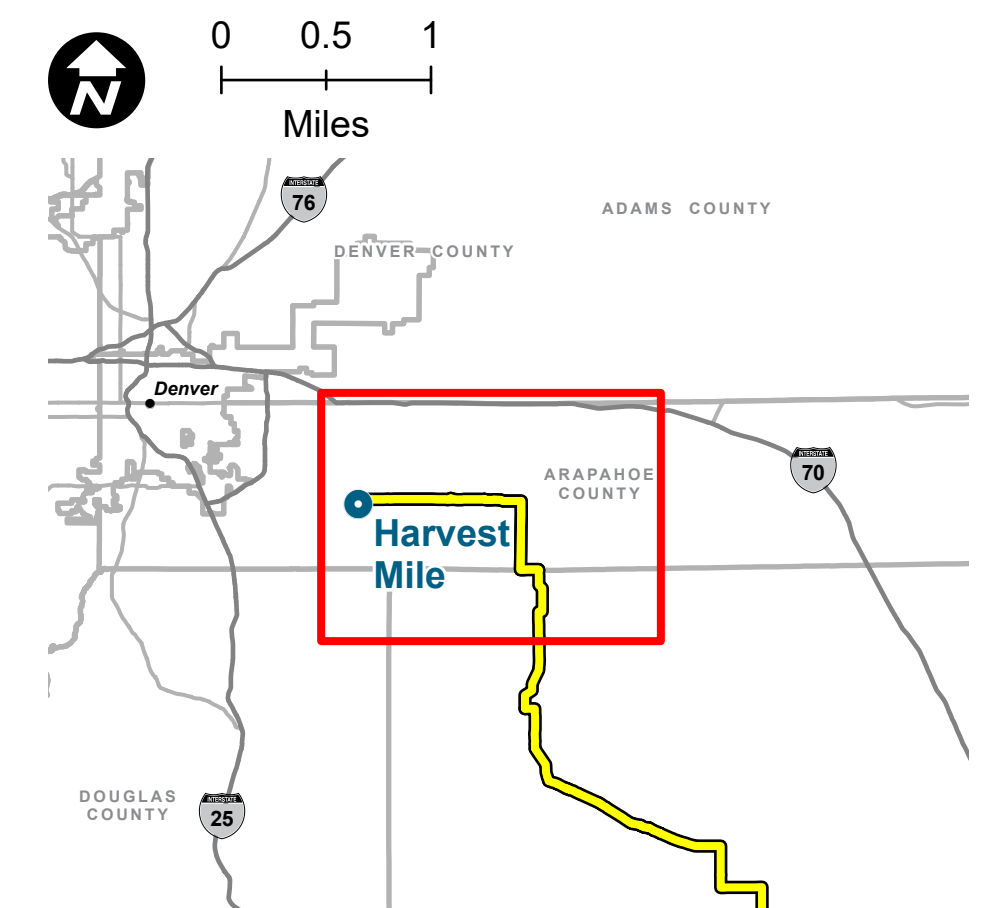
Rule 309.e.1 Other Consultation Habitat

- ☐ Bald Eagle Active Nest Site HPHE1

*The entirety of the proposed route in Arapahoe County overlaps black-tailed prairie dog high-potential colony occurrence range, Preble's meadow jumping mouse overall range, golden eagle breeding range, and burrowing owl breeding range (CPW 2025a).

PRELIMINARY, SUBJECT TO CHANGE

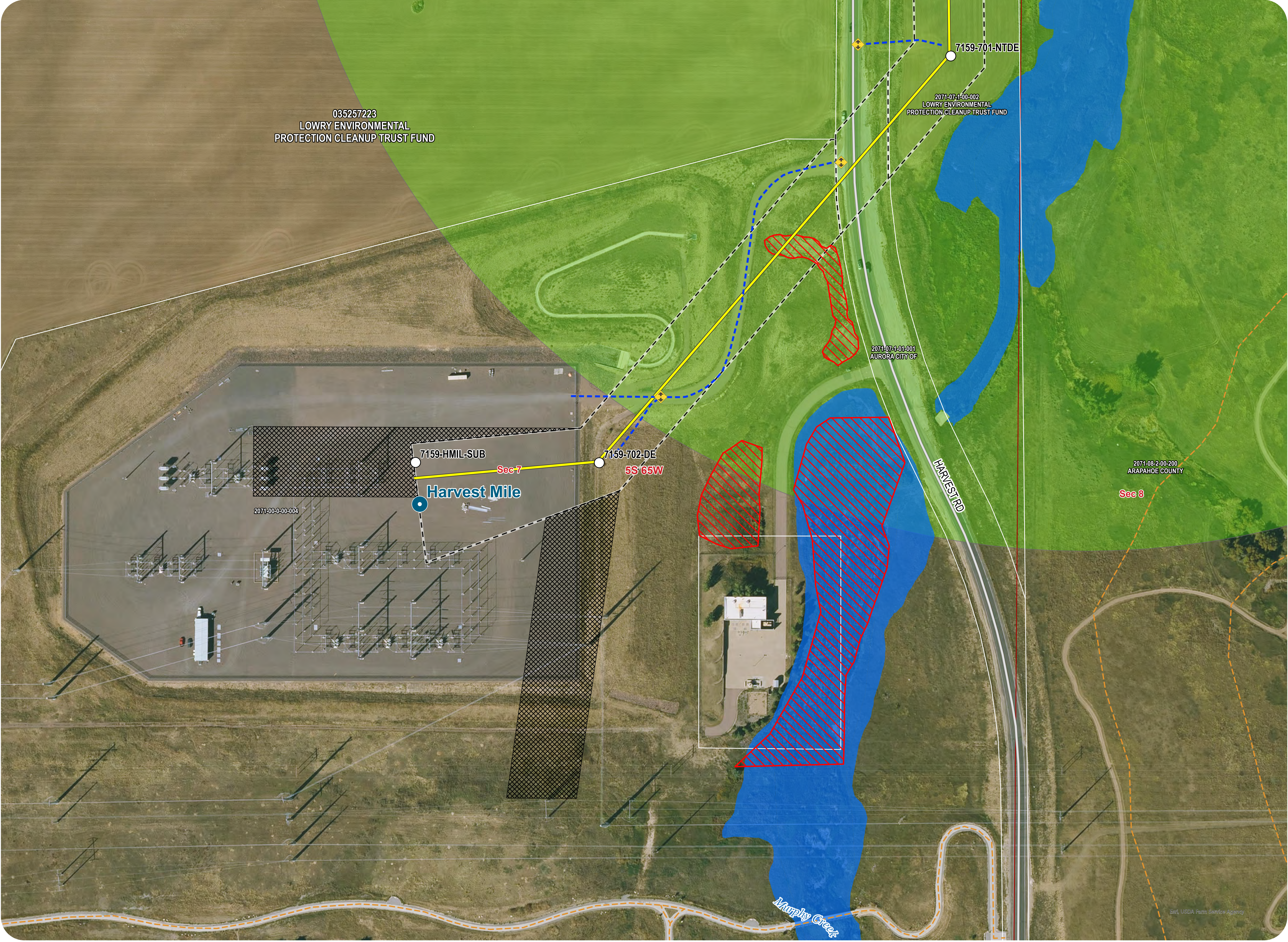
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**FIGURE 2:
ARAPAHOE COUNTY SHEET MAPS**

COLORADO'S POWER PATHWAY



Legend

- Preliminary Structure Location
- Preferred Transmission Route
- Access Road
- Proposed 150-foot ROW
- Pull Site
- Access Point Location
- City of Aurora
- Trail
- Field Verified Wetland
- Raptor Nest Buffer (Active Nest)
- Suitable BUOW Habitat

Hydrology (FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

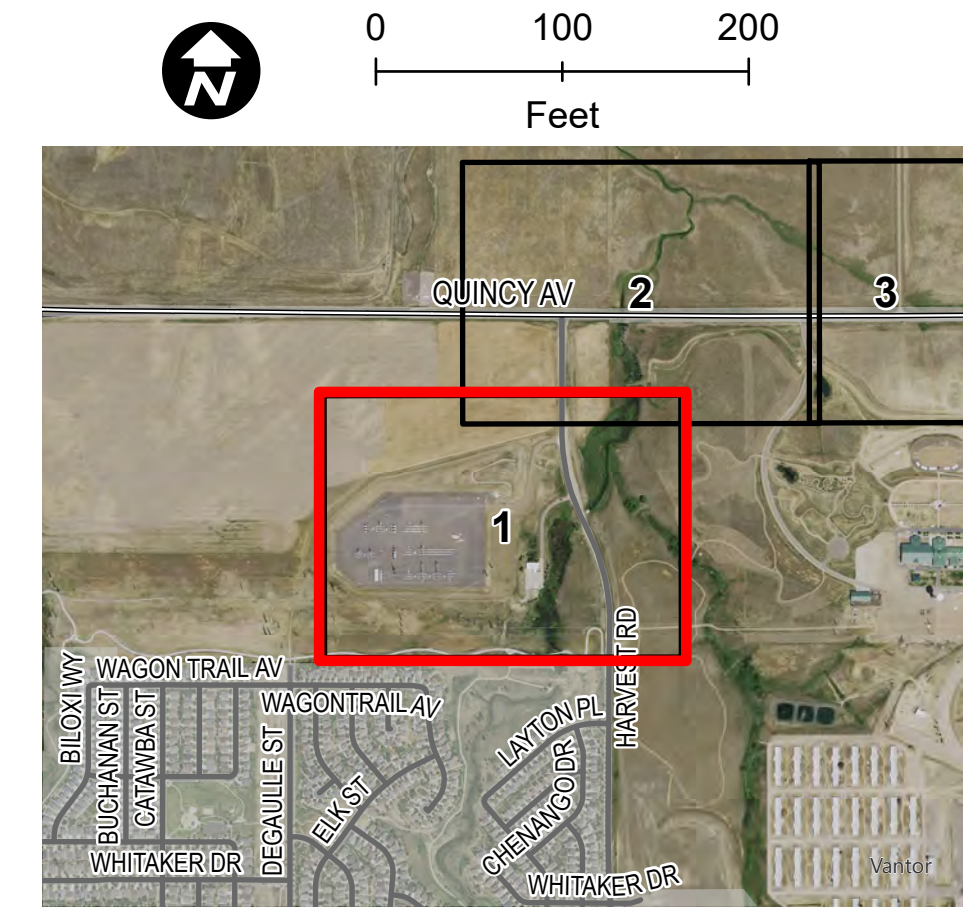
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

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COLORADO'S POWER PATHWAY



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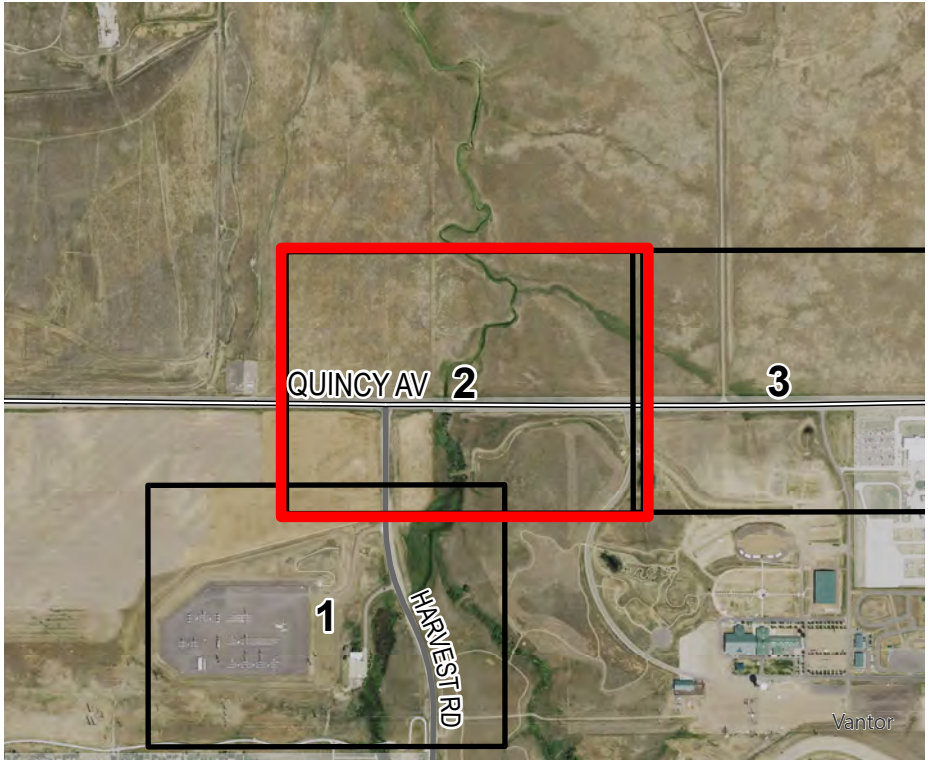
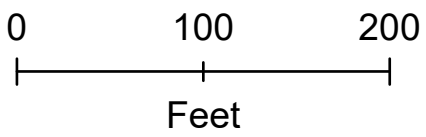
- Section
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Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

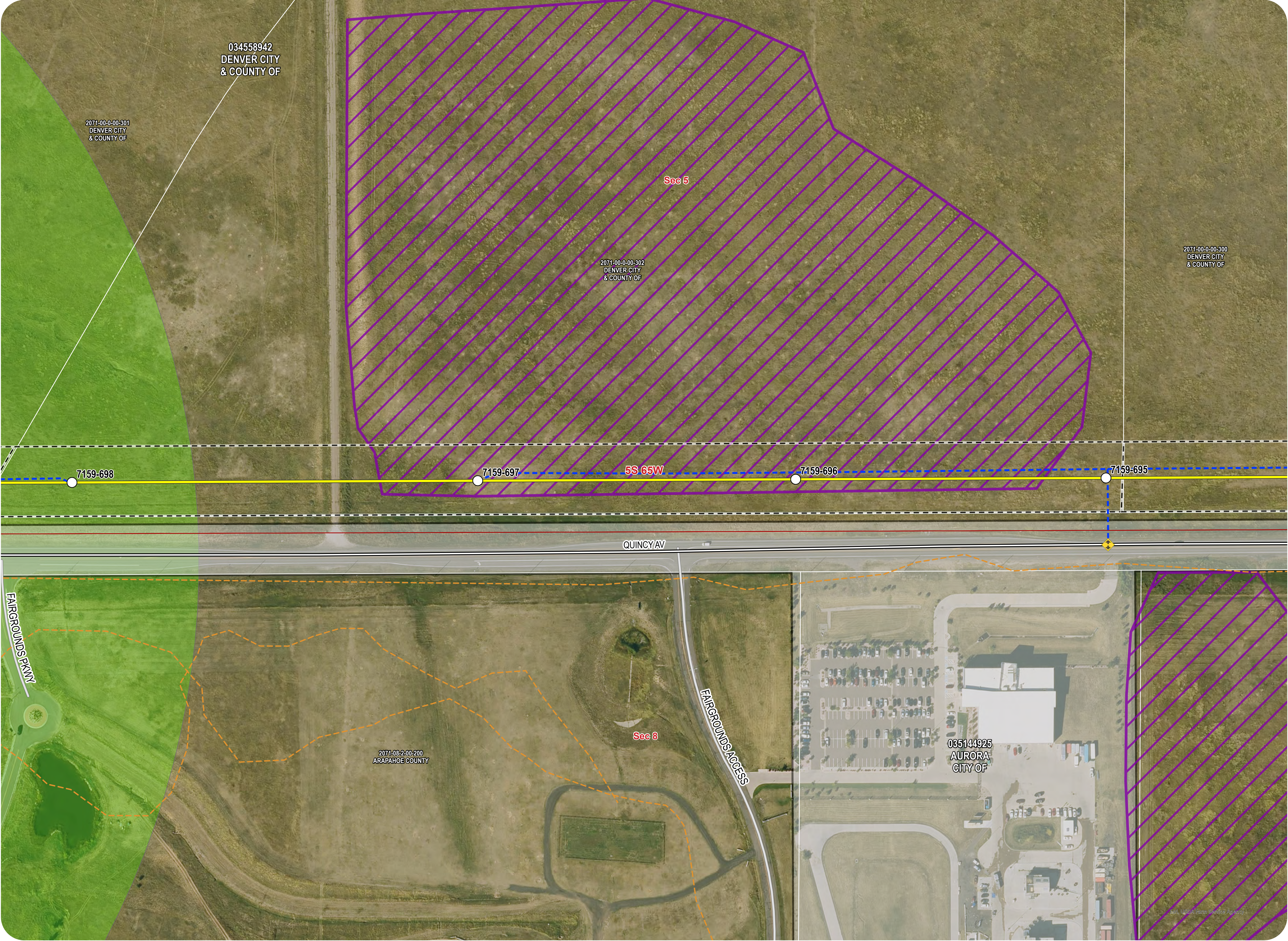
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COLORADO'S POWER PATHWAY



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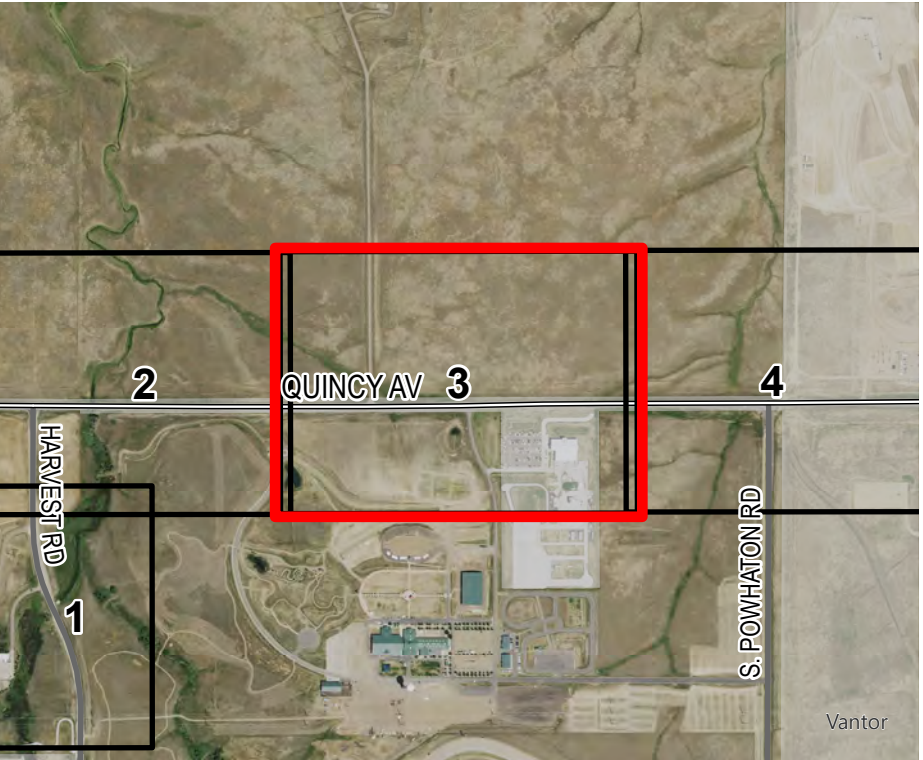
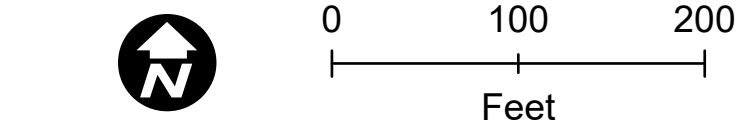
- Hydrology**
(FEMA 2024)
- 100-year FEMA Floodplain

- Public Land Survey System**
(BLM 2020)
- Section
 - Township/Range

- Jurisdiction**
(COMap 2022, CO SLB 2023)
- State
 - CO State Stewardship

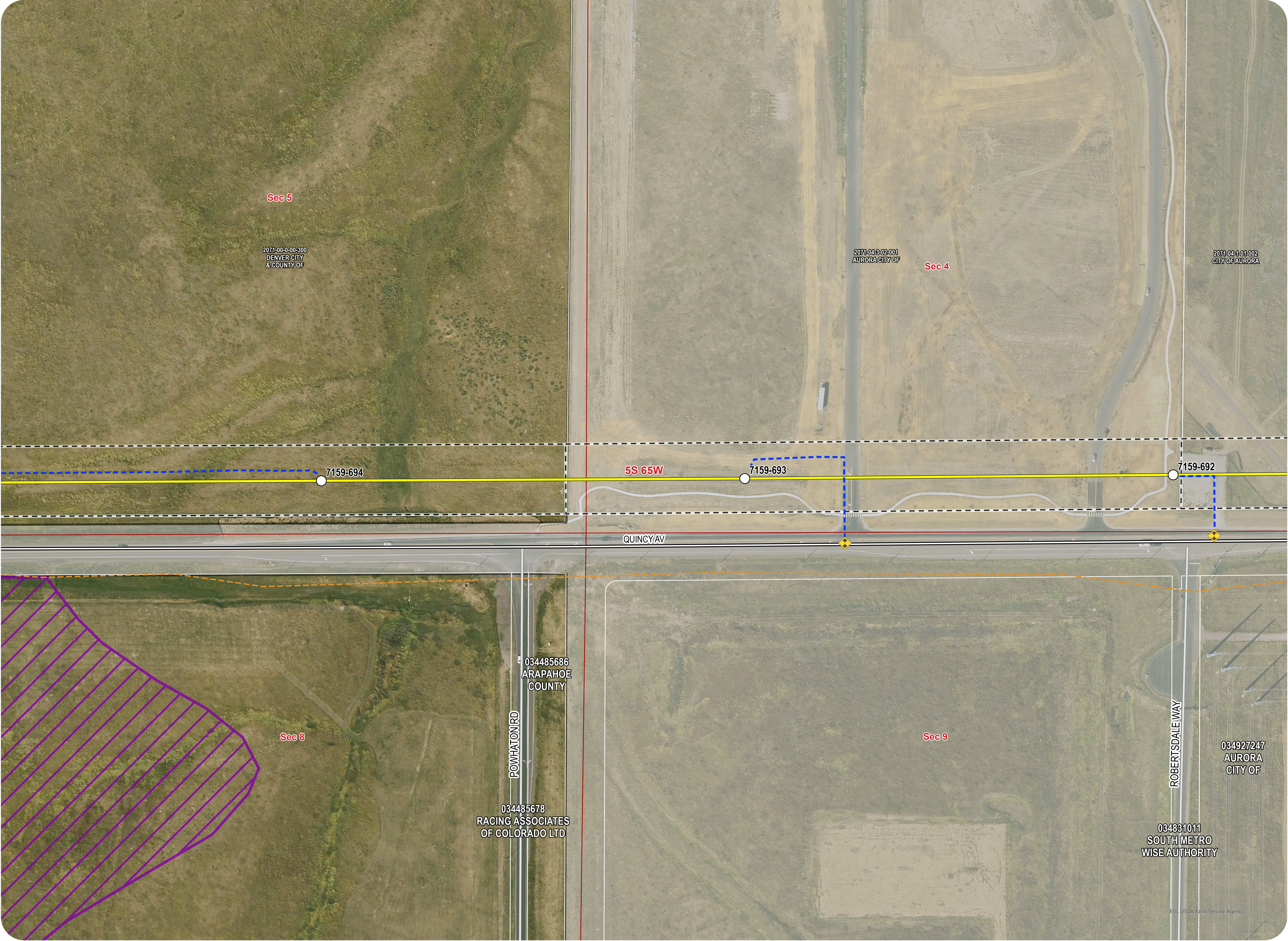
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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System

(BLM 2020)

- Section
- Township/Range

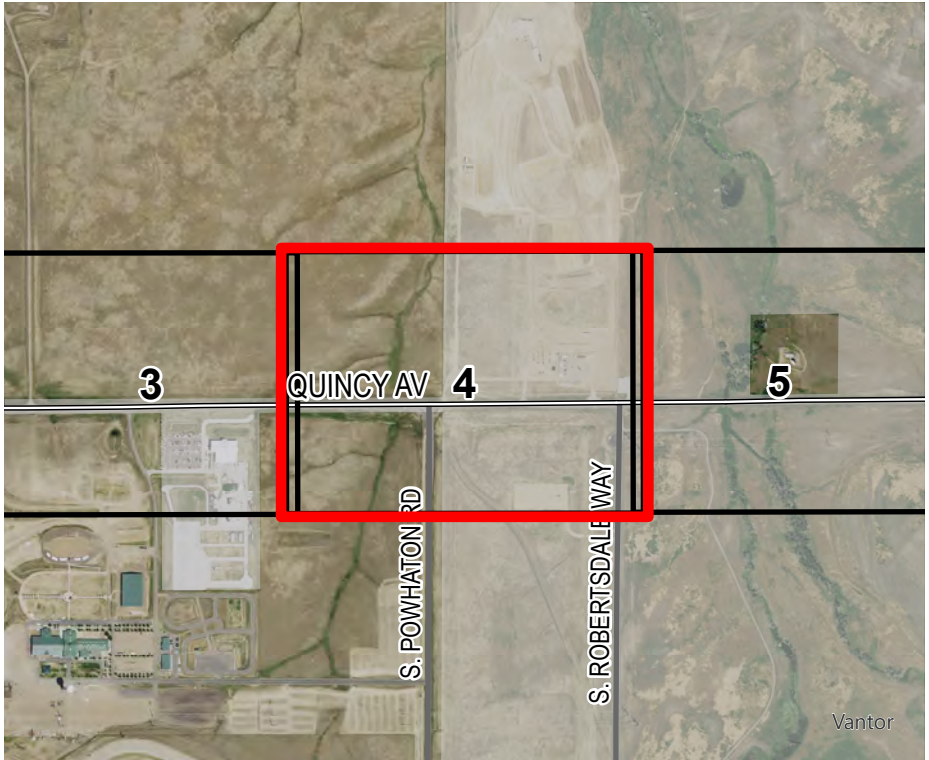
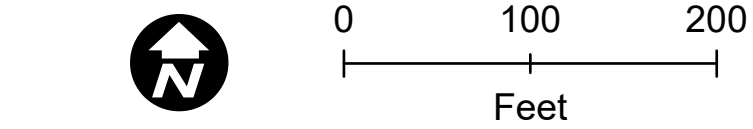
Jurisdiction

(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

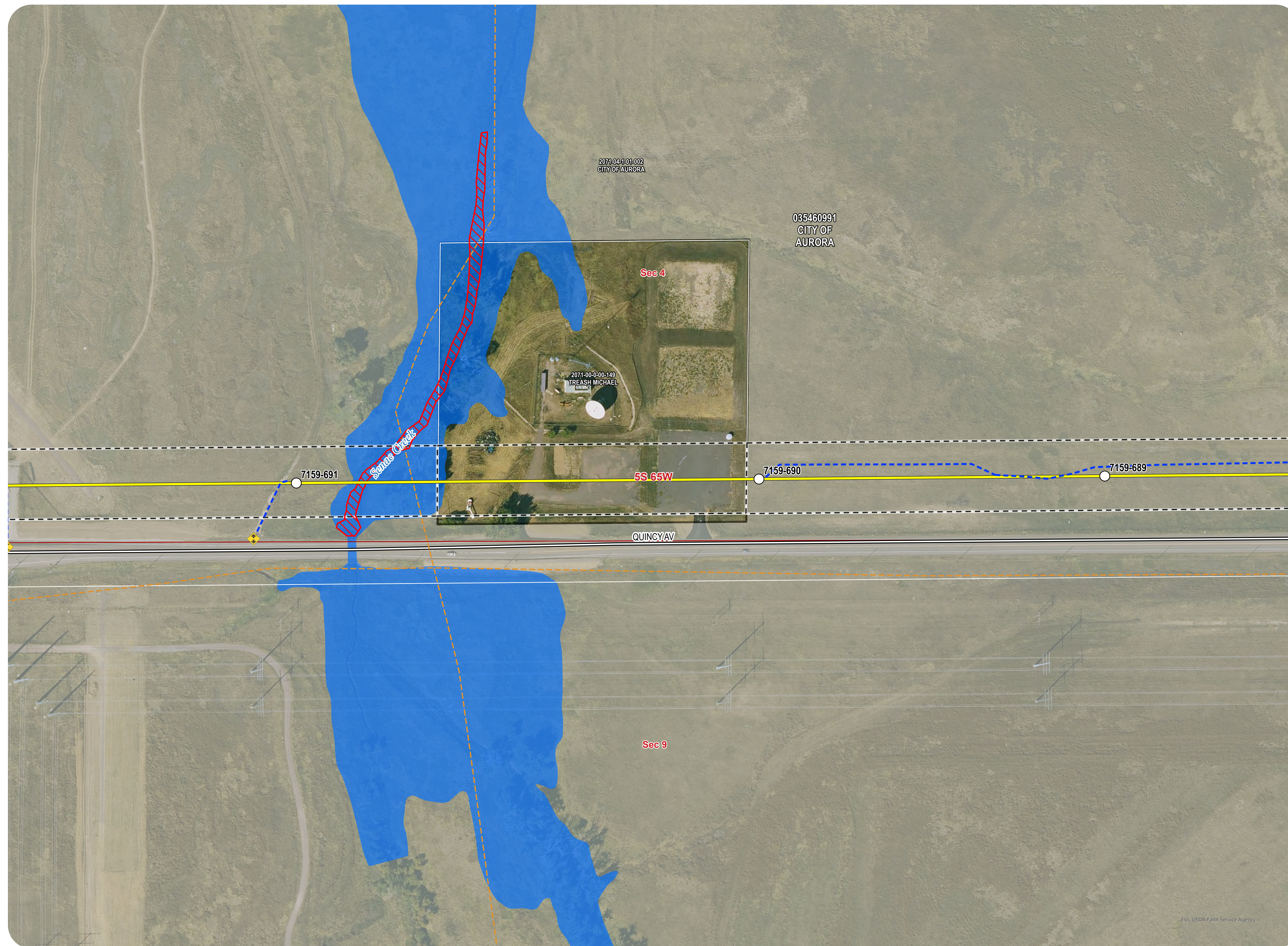
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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System
(BLM 2020)

- Section
 Township/Range

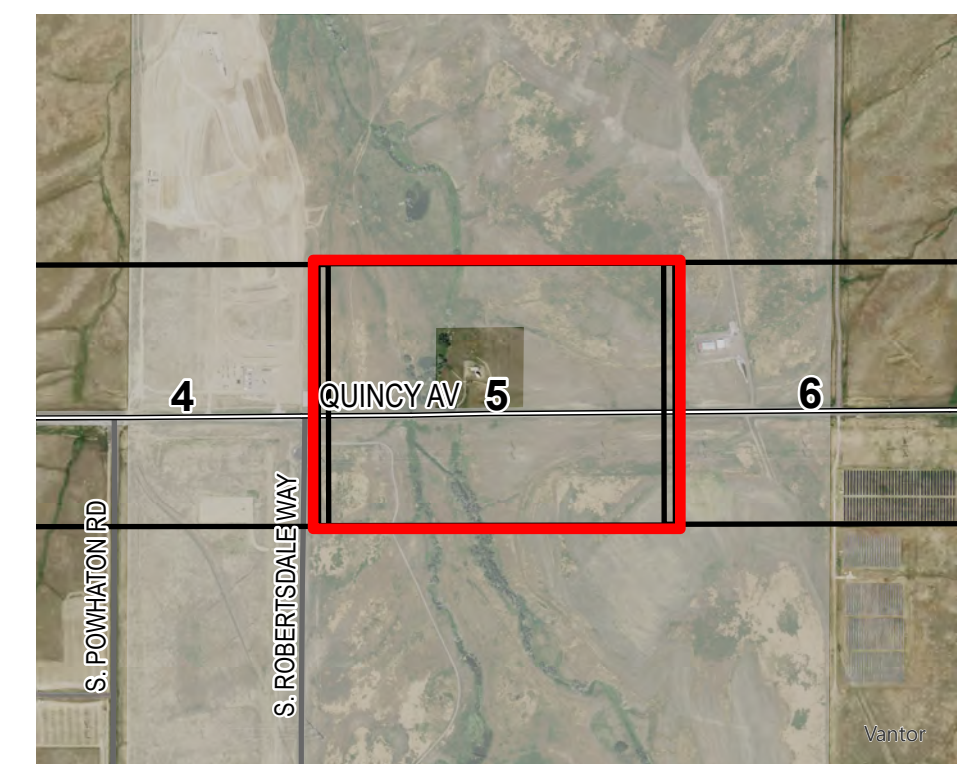
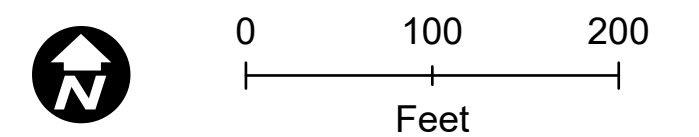
Jurisdiction

(COMap 2022, CO SLE

-  State
 CO State Stewardship

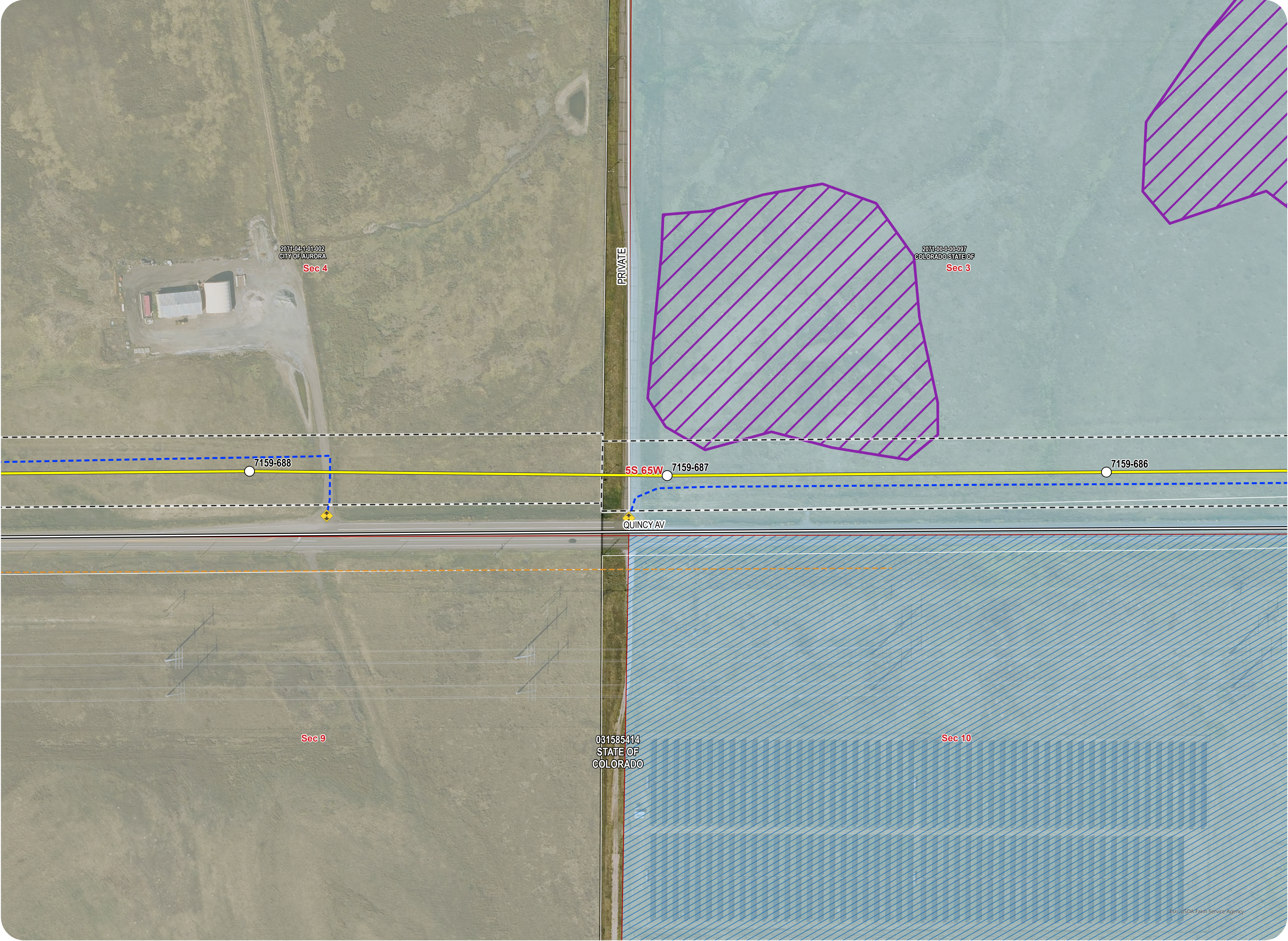
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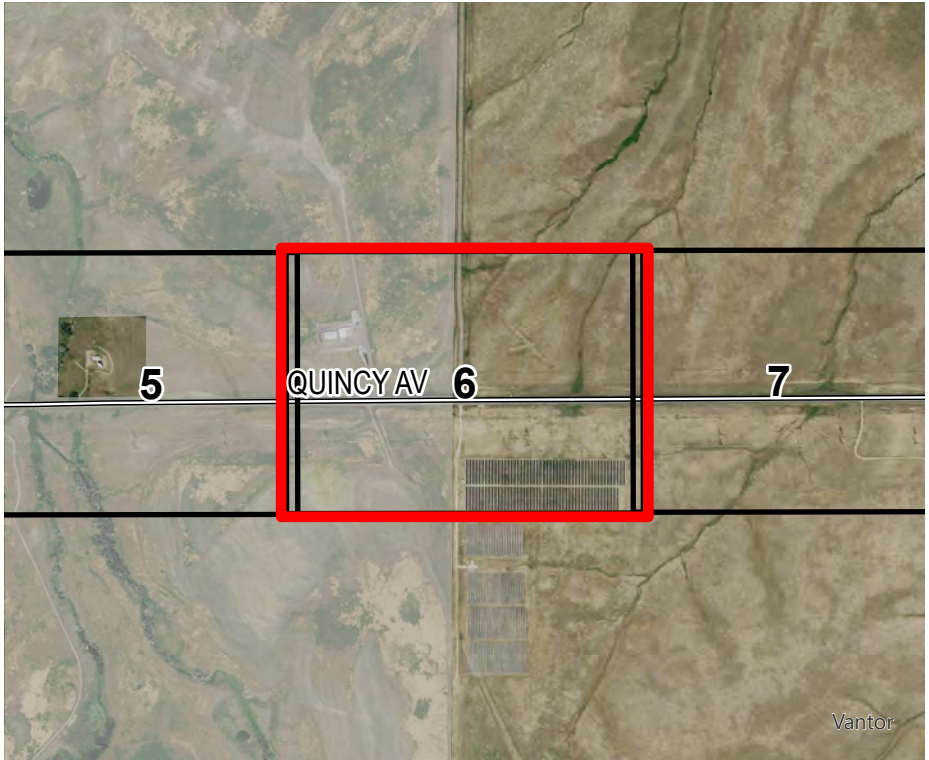
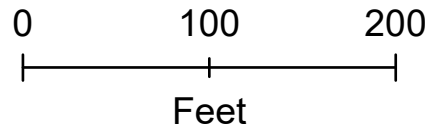
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Jurisdiction (COMap 2022, CO SLB 2023)

- State
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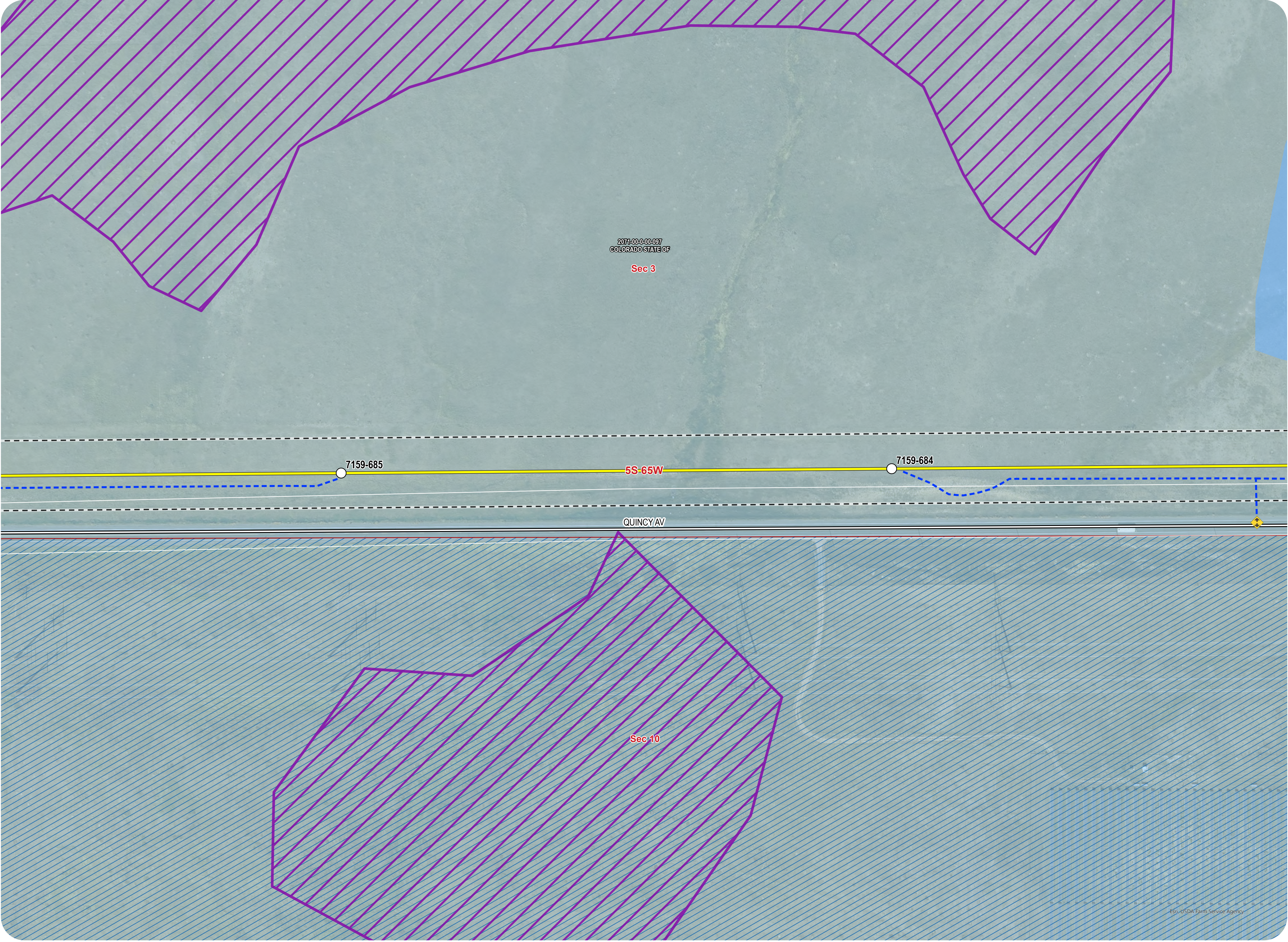
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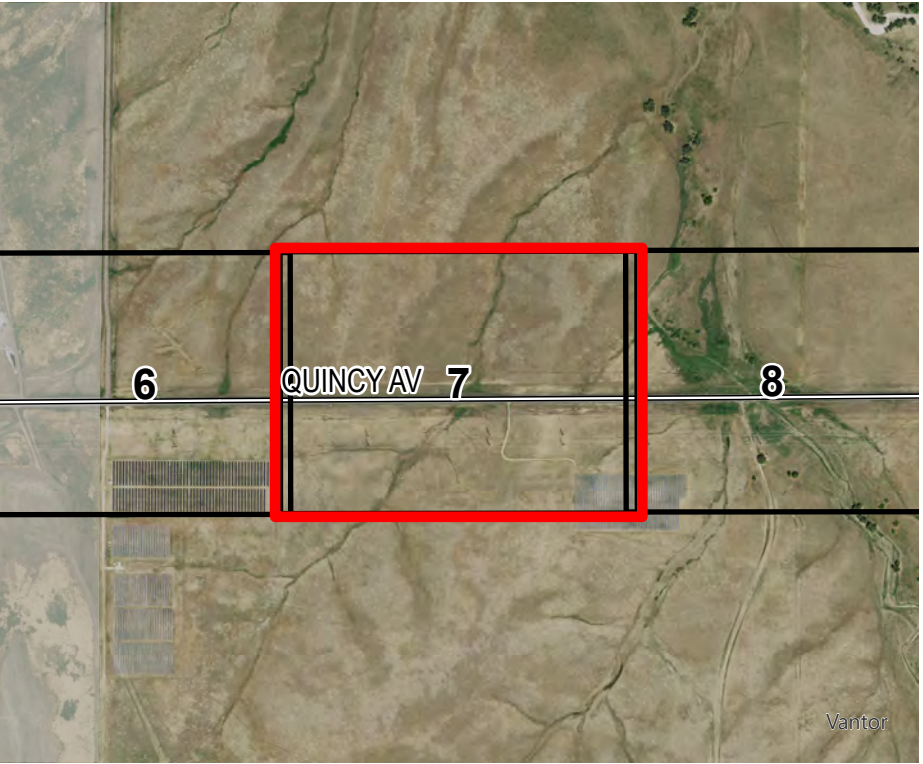
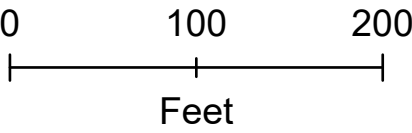
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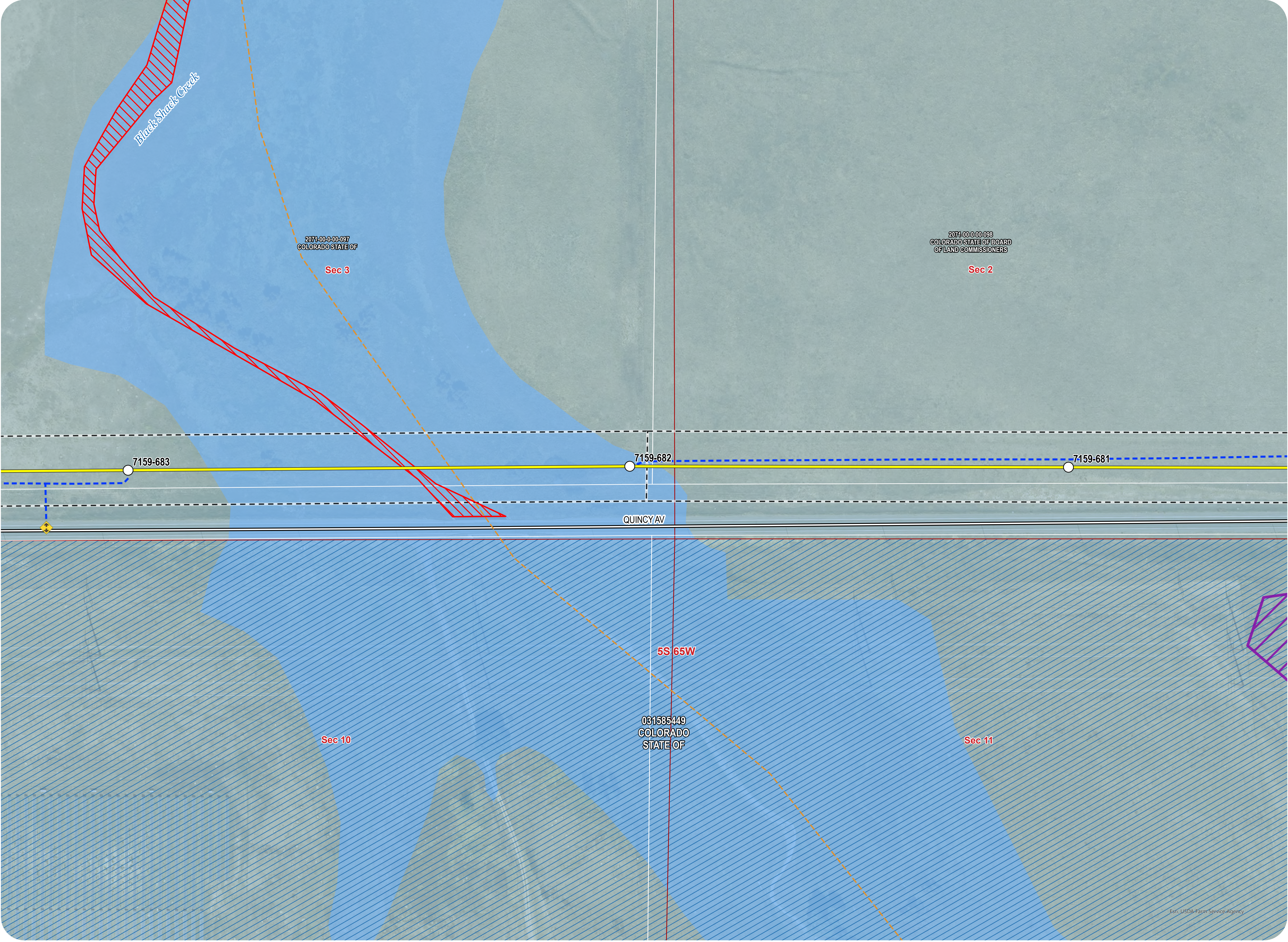
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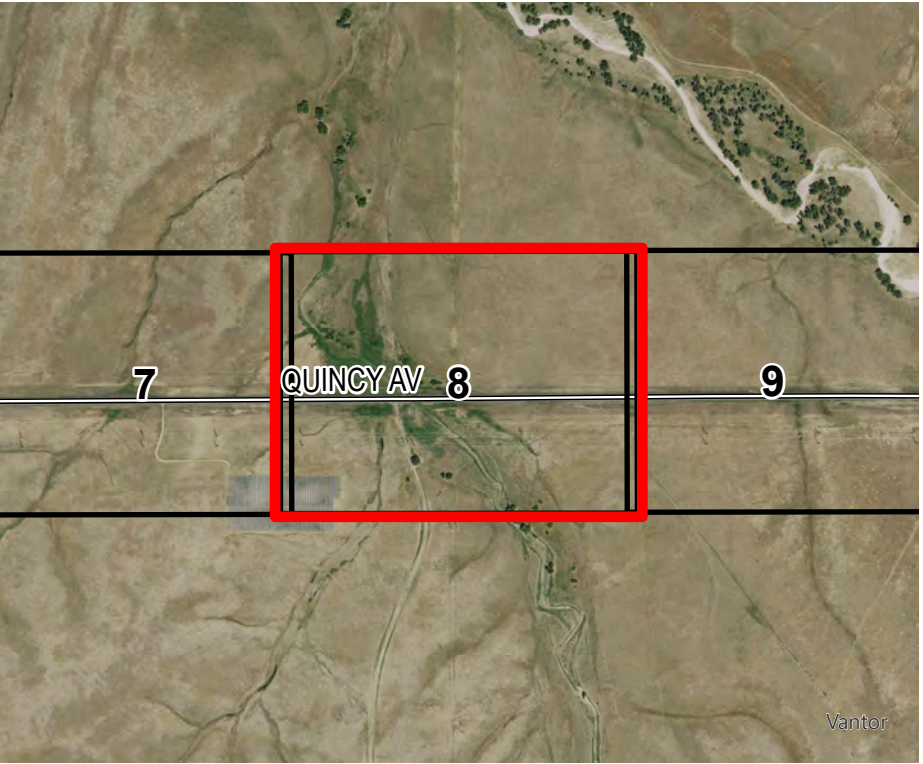
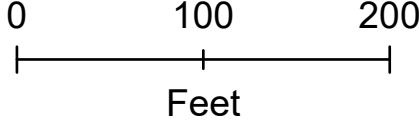
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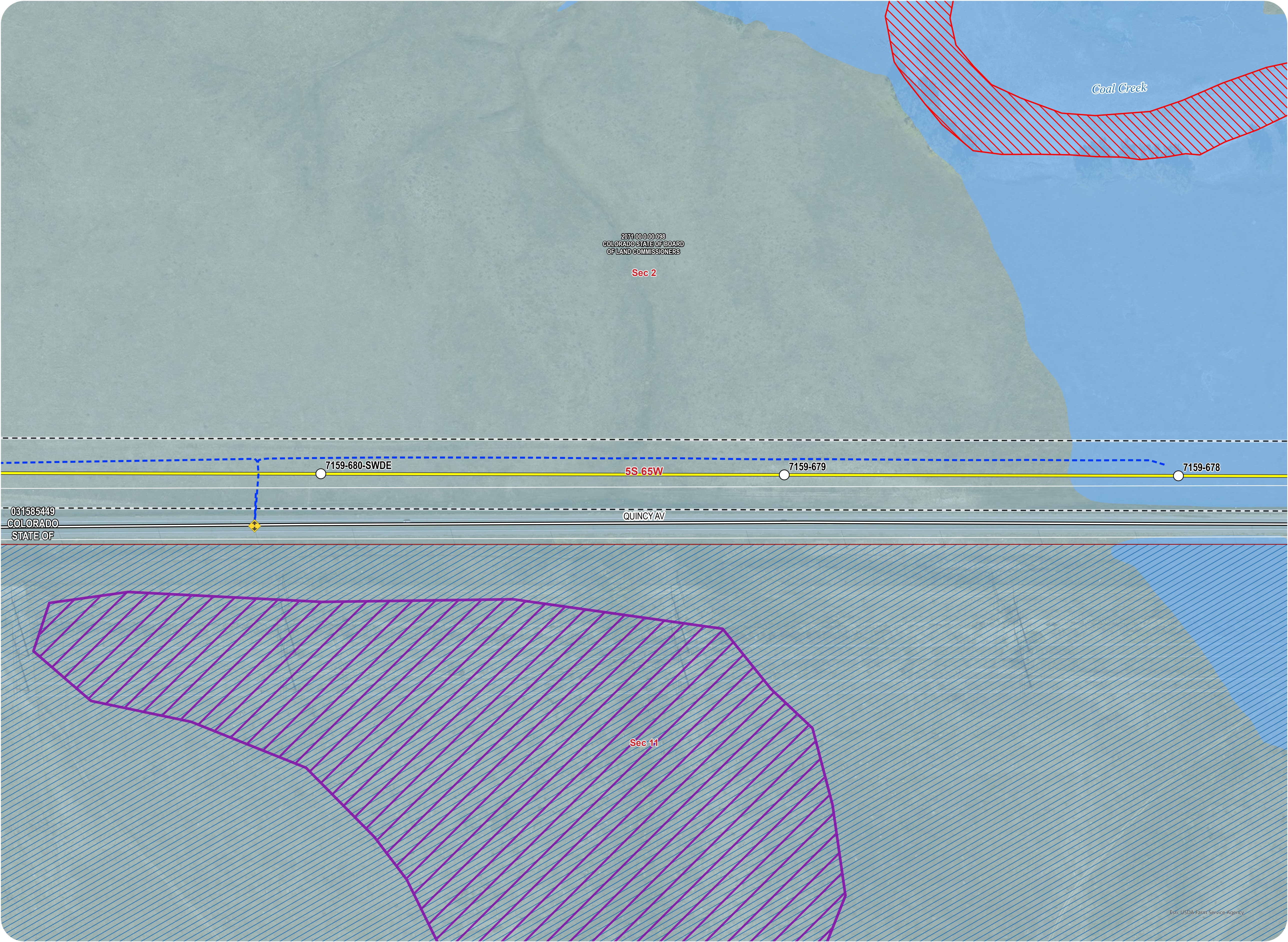
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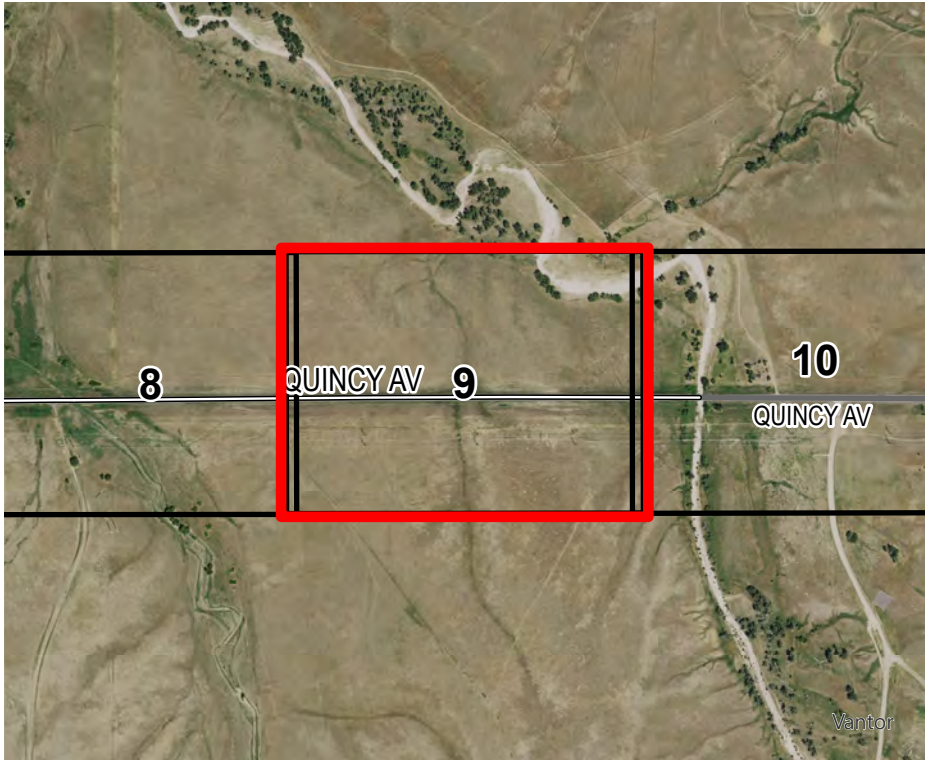
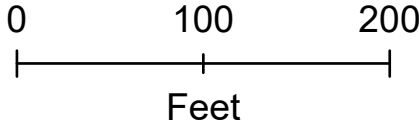
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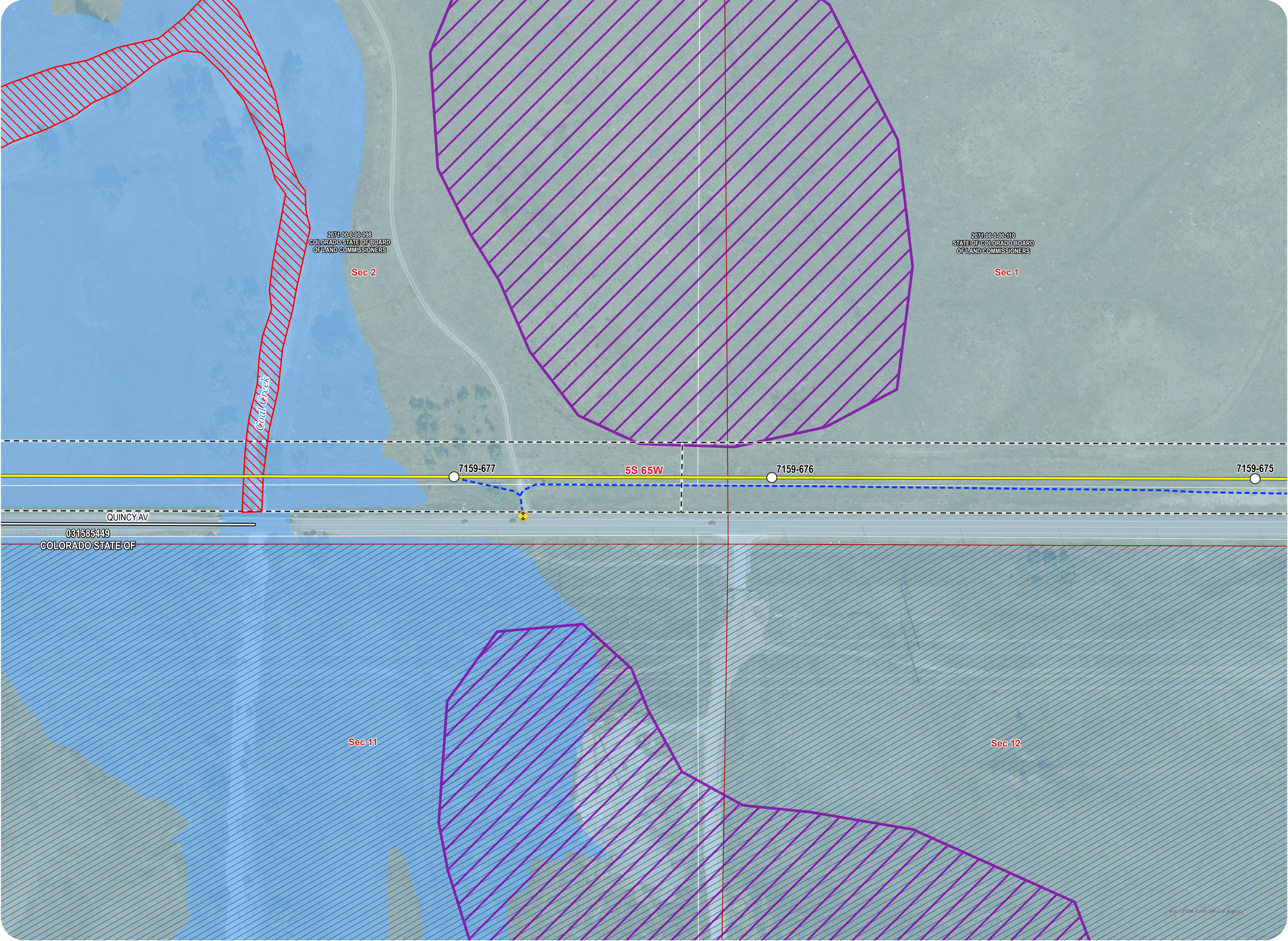
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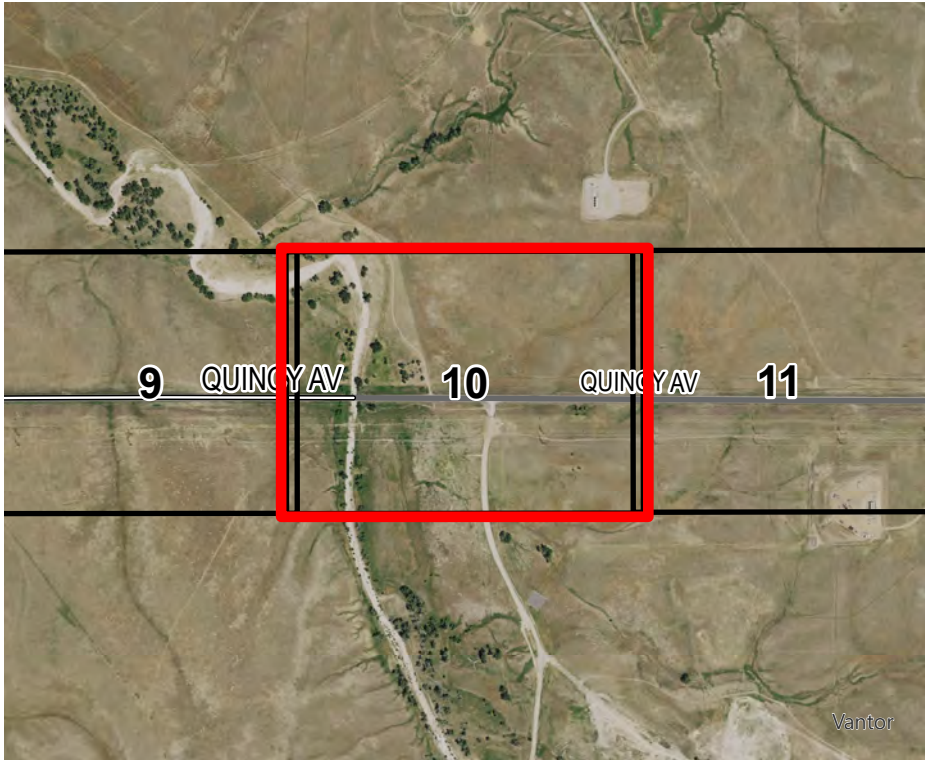
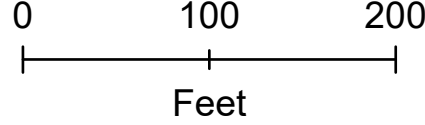
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Jurisdiction (COMap 2022, CO SLB 2023)

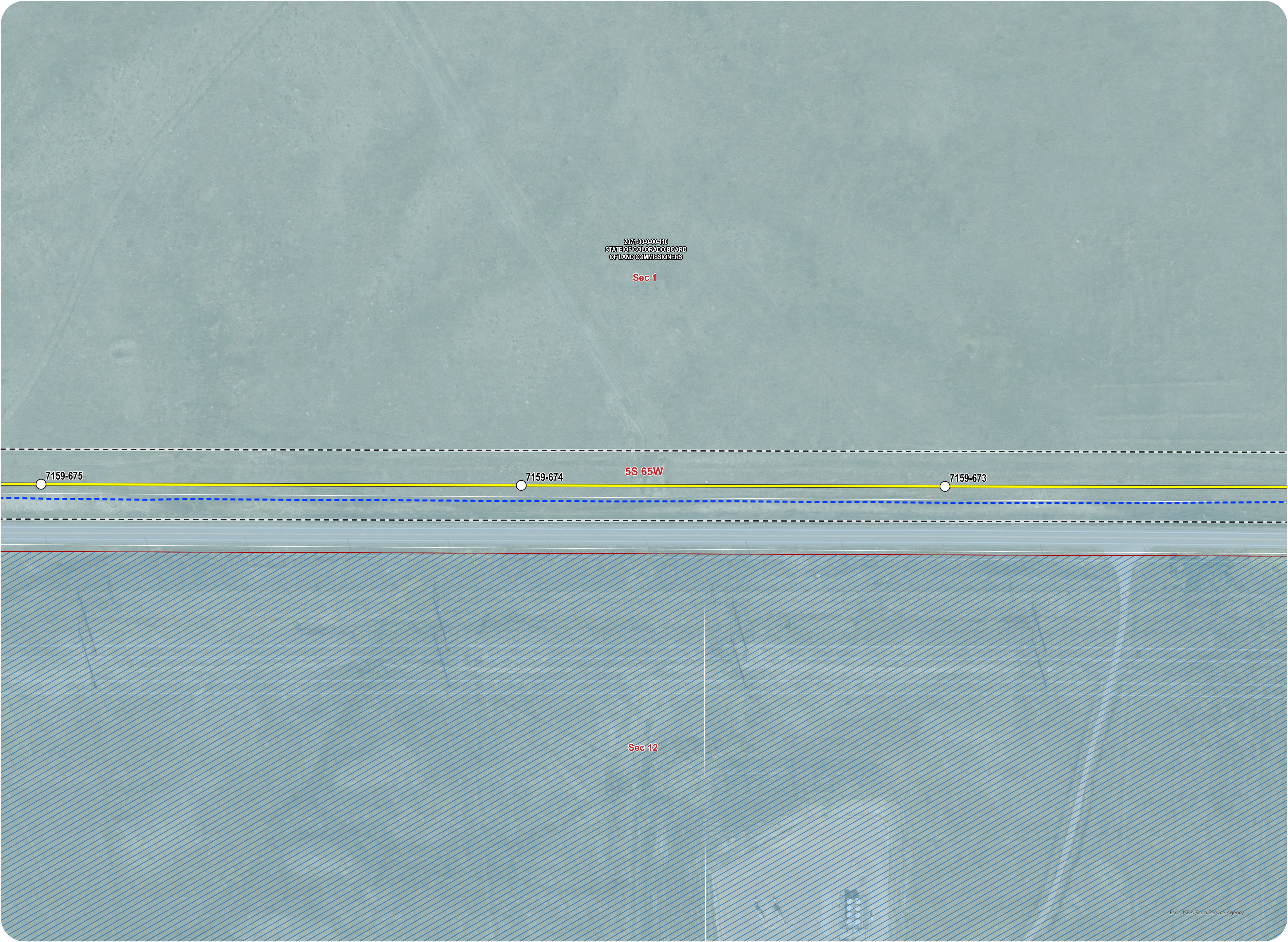
- State
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Aerial - 2024 NAIP Imagery

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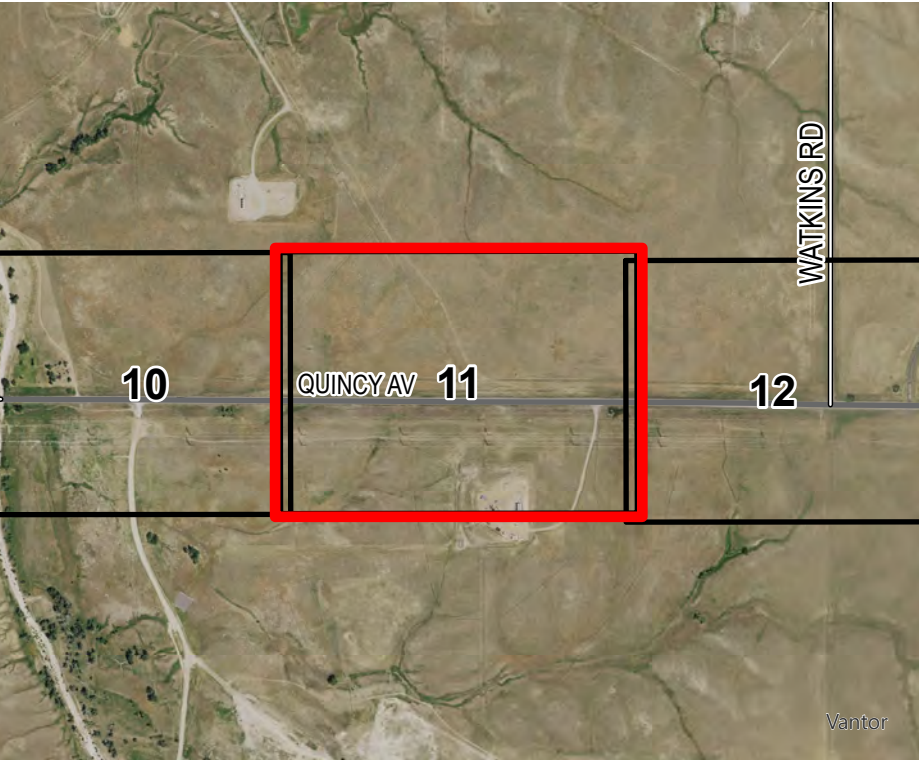
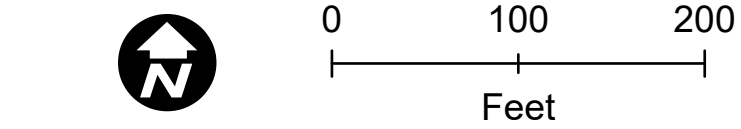
- Section
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Jurisdiction
(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

Aerial - 2024 NAIP Imagery

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COLORADO'S POWER PATHWAY



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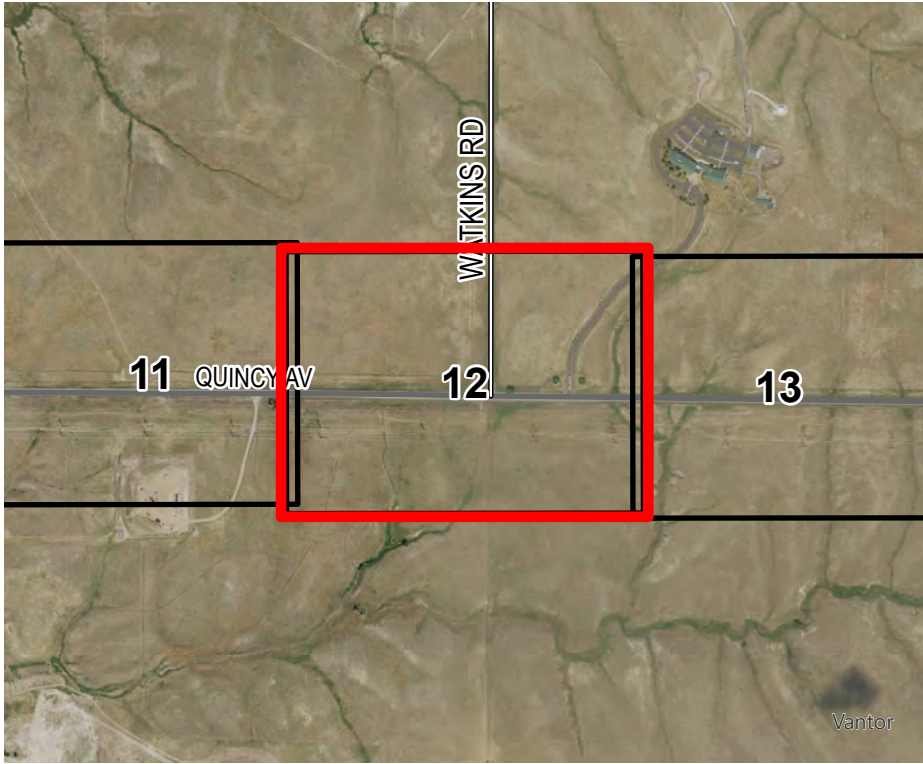
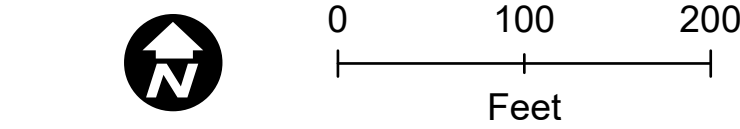
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Aerial - 2024 NAIP Imagery

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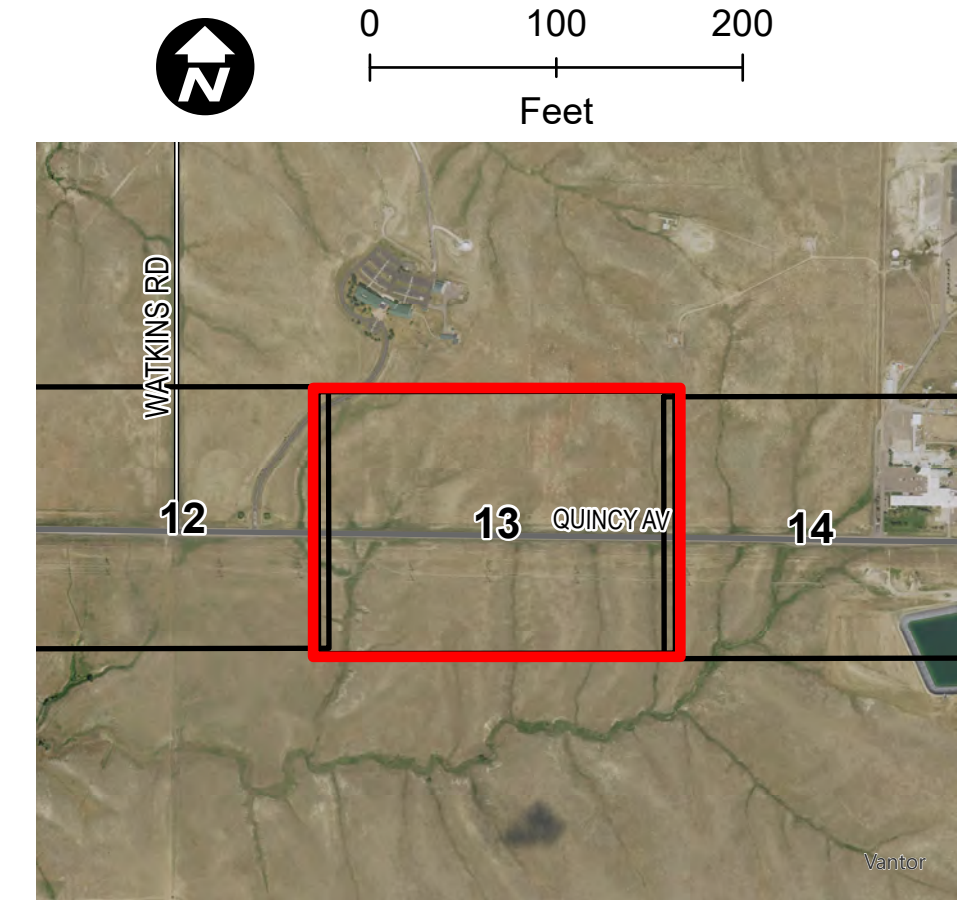
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COLORADO'S POWER PATHWAY



Legend

- Preliminary Structure Location
- Preferred Transmission Route
- Access Road
- Proposed 150-foot ROW
- Pull Site
- Access Point Location
- City of Aurora
- Trail
- Field Verified Wetland
- Raptor Nest Buffer (Active Nest)
- Suitable BUOW Habitat

Hydrology (FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

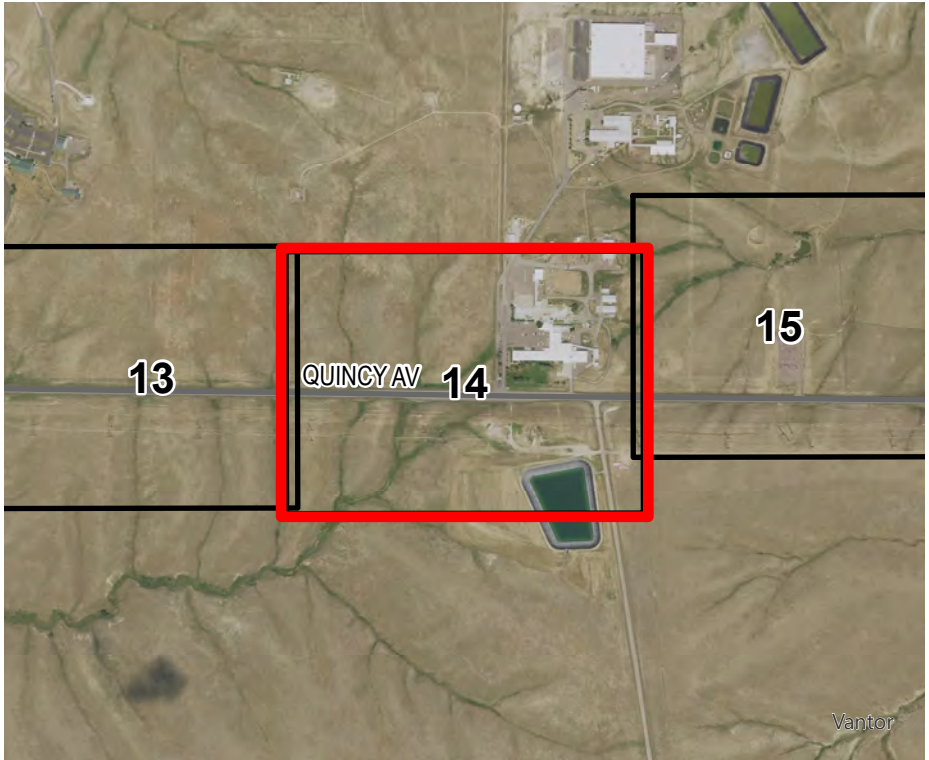
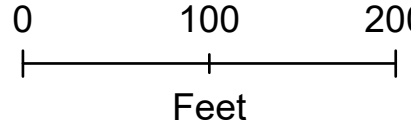
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

Aerial - 2024 NAIP Imagery

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COLORADO'S POWER PATHWAY



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Hydrology (FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

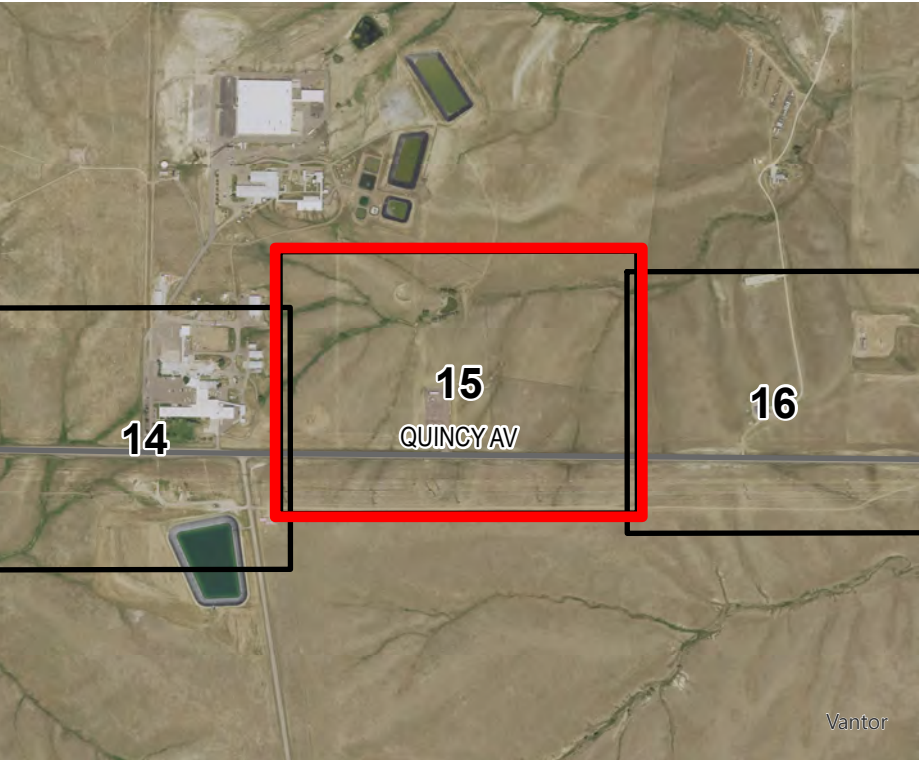
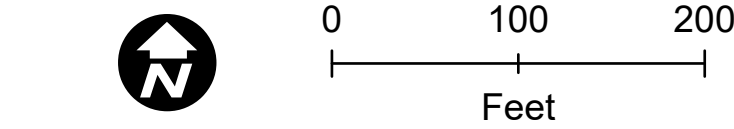
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

Aerial - 2024 NAIP Imagery

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Hydrology
(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System
(BLM 2020)

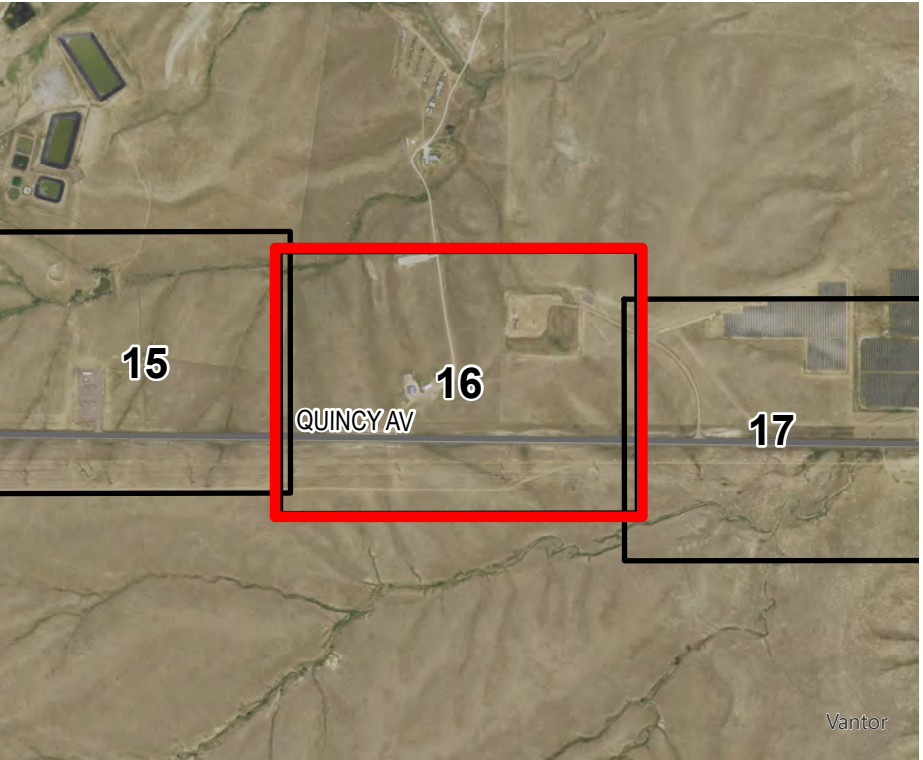
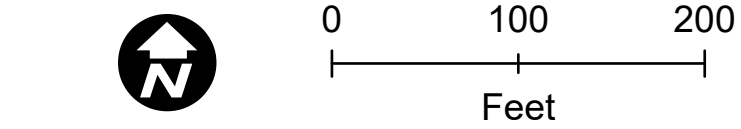
- Section
- Township/Range

Jurisdiction
(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

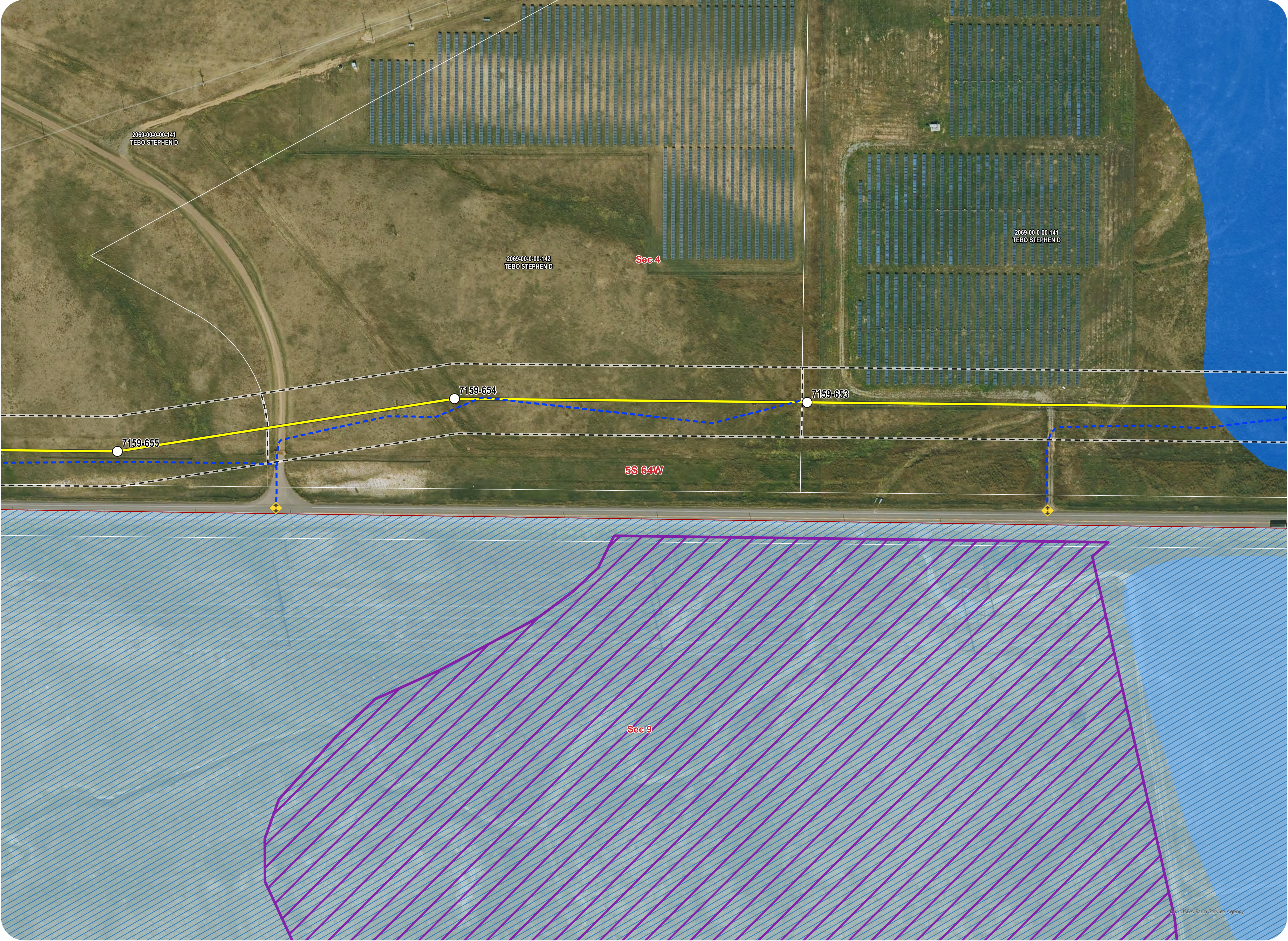
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COLORADO'S POWER PATHWAY



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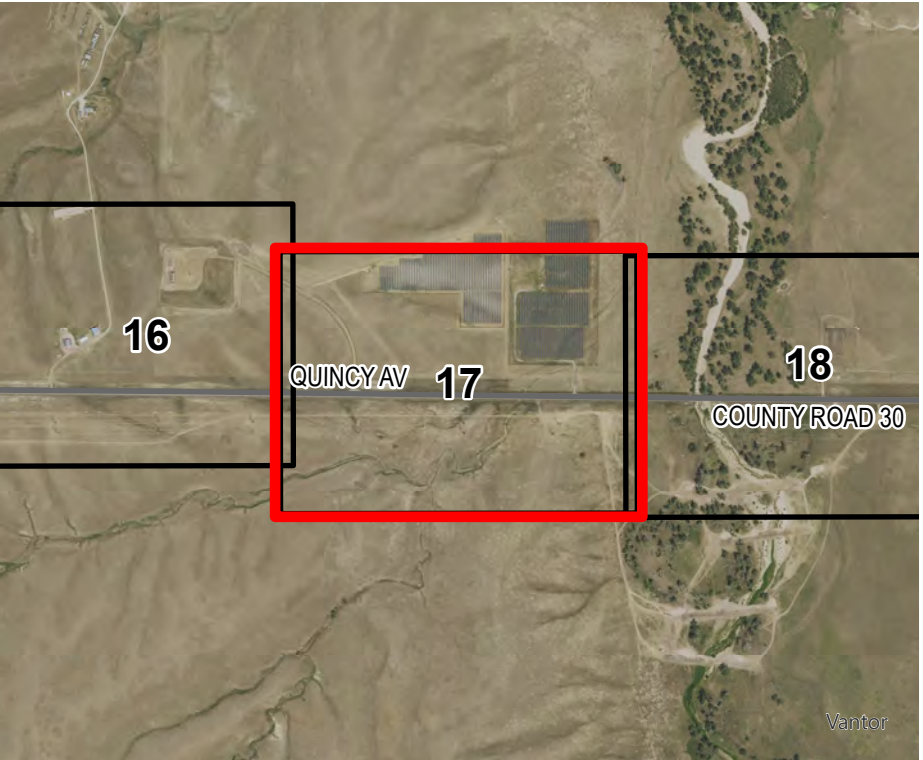
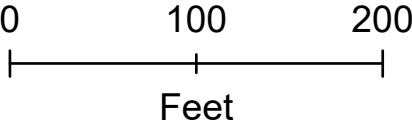
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

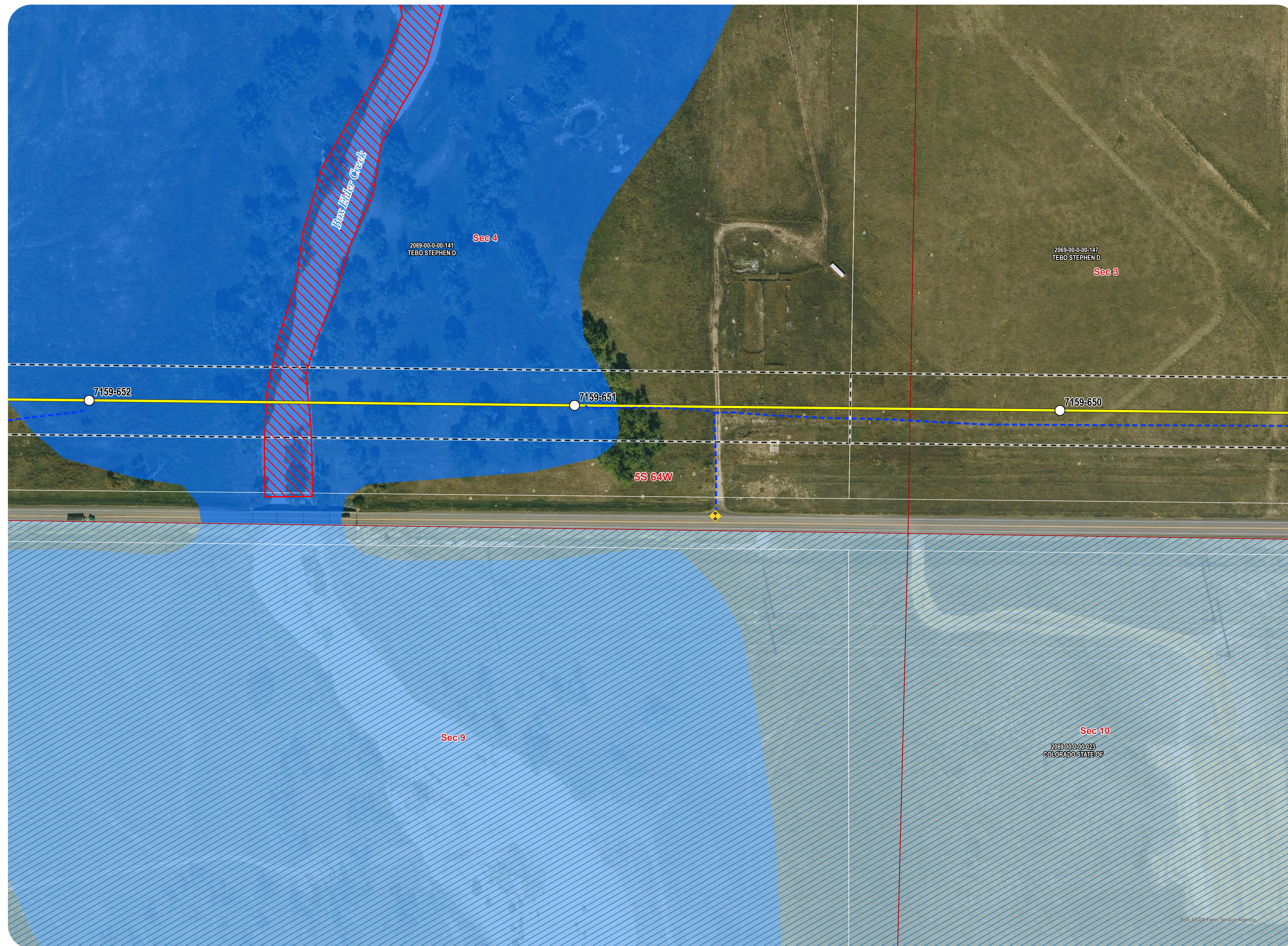
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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System
(BLM 2020)

- Section
 Township/Range

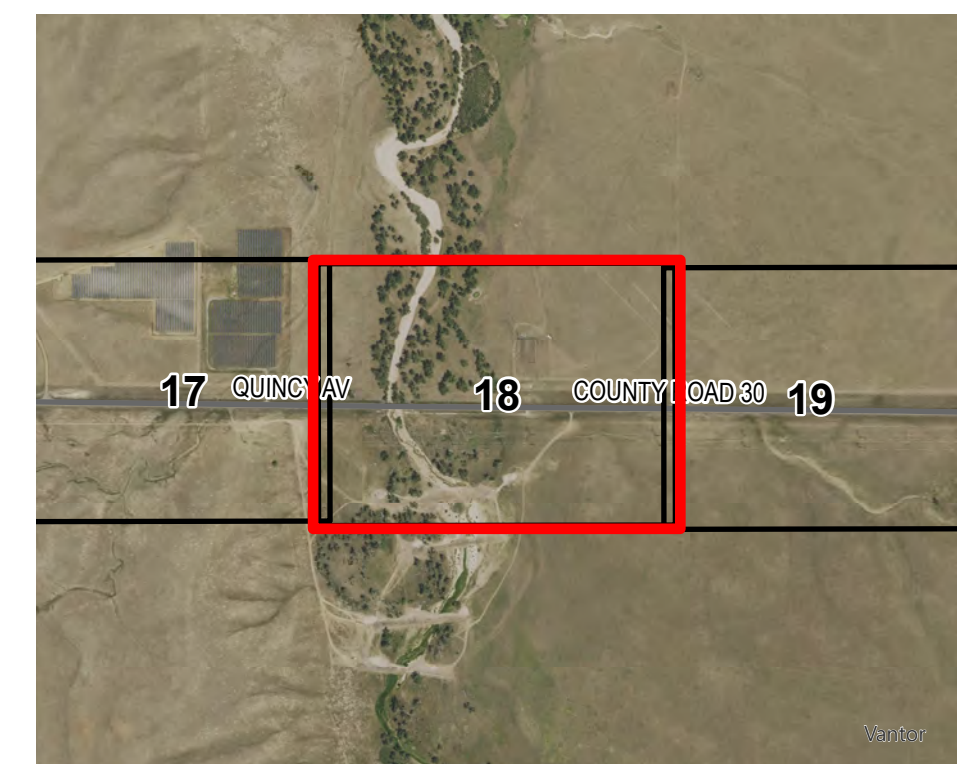
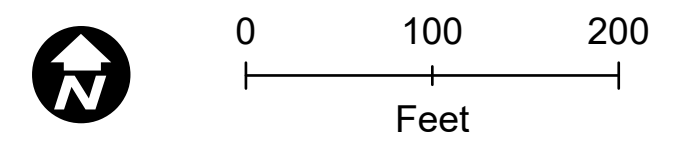
Jurisdiction

(COMap 2022, CO SLB 2023)

-  State
 CO State Stewardship

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COLORADO'S POWER PATHWAY



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Hydrology (FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

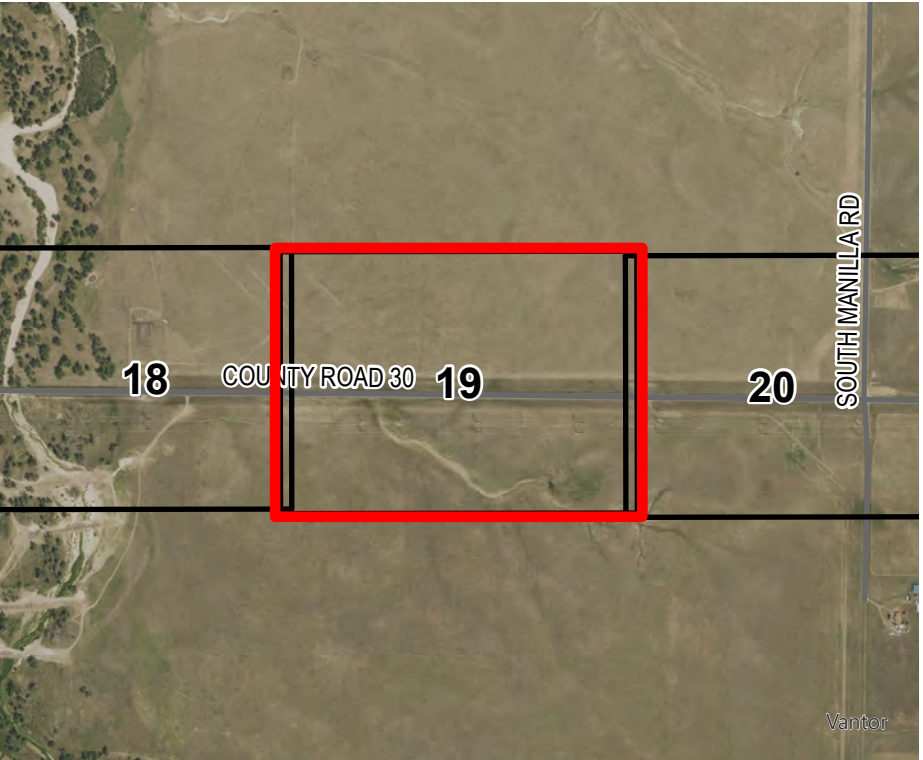
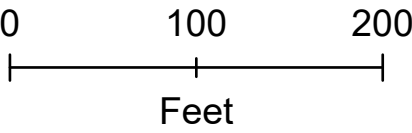
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Jurisdiction (COMap 2022, CO SLB 2023)

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- CO State Stewardship

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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

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Public Land Survey System

(BLM 2020)

- Section
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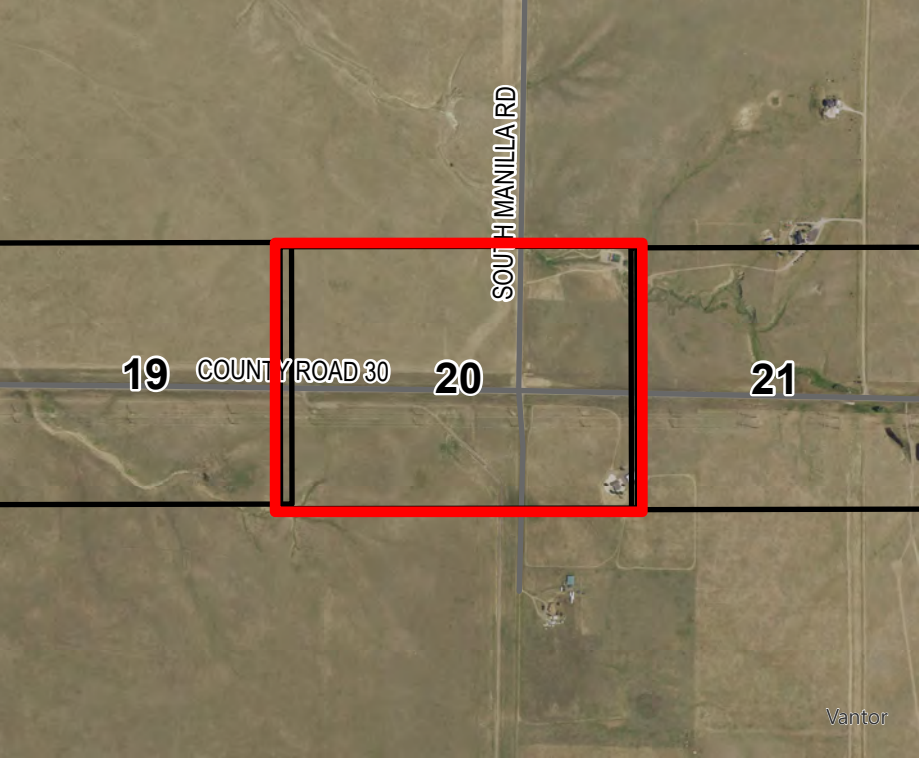
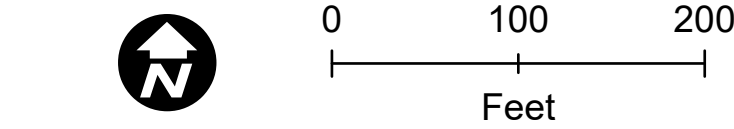
Jurisdiction

(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

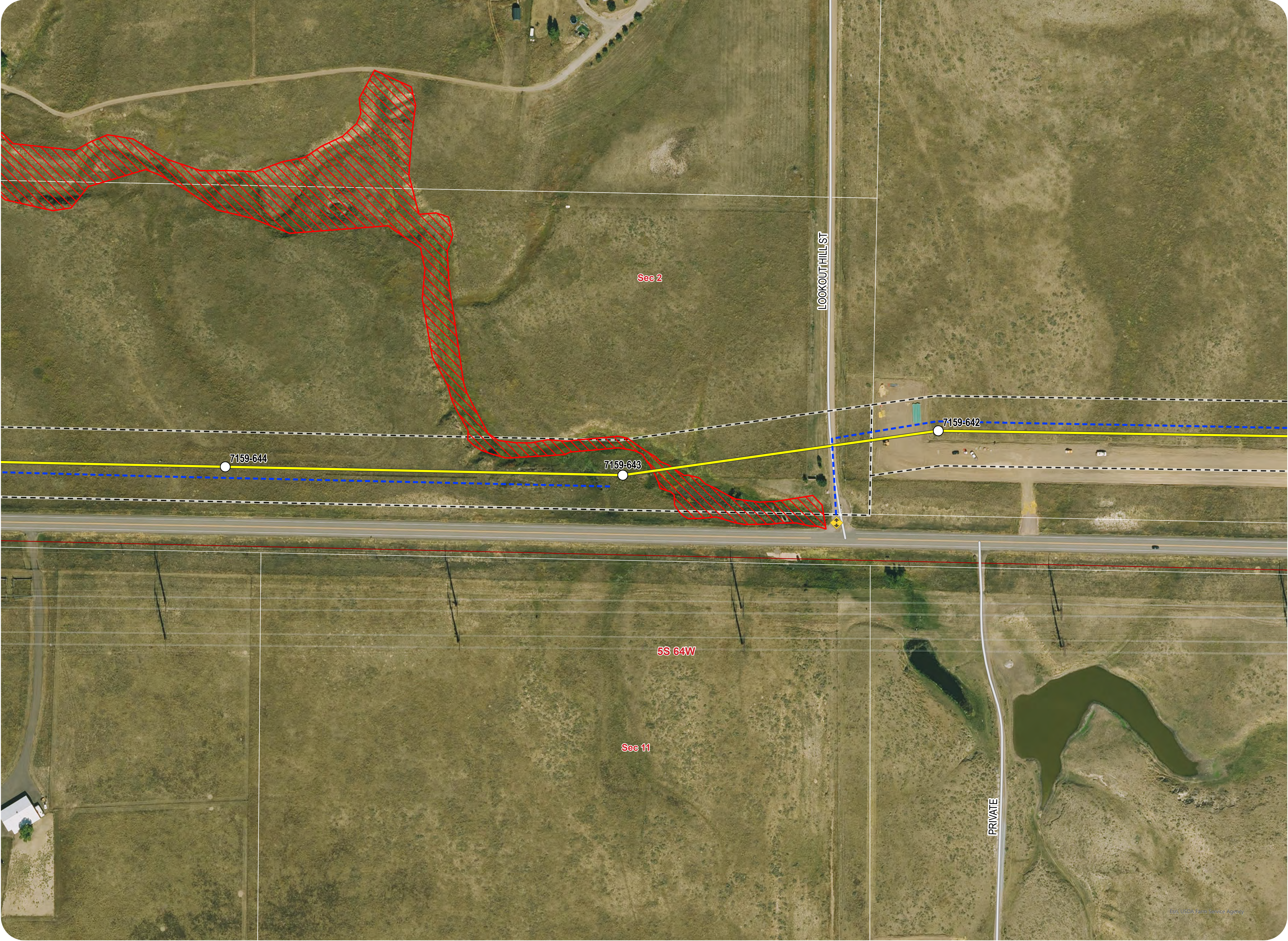
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COLORADO'S POWER PATHWAY



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Hydrology (FEMA 2024)

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Public Land Survey System (BLM 2020)

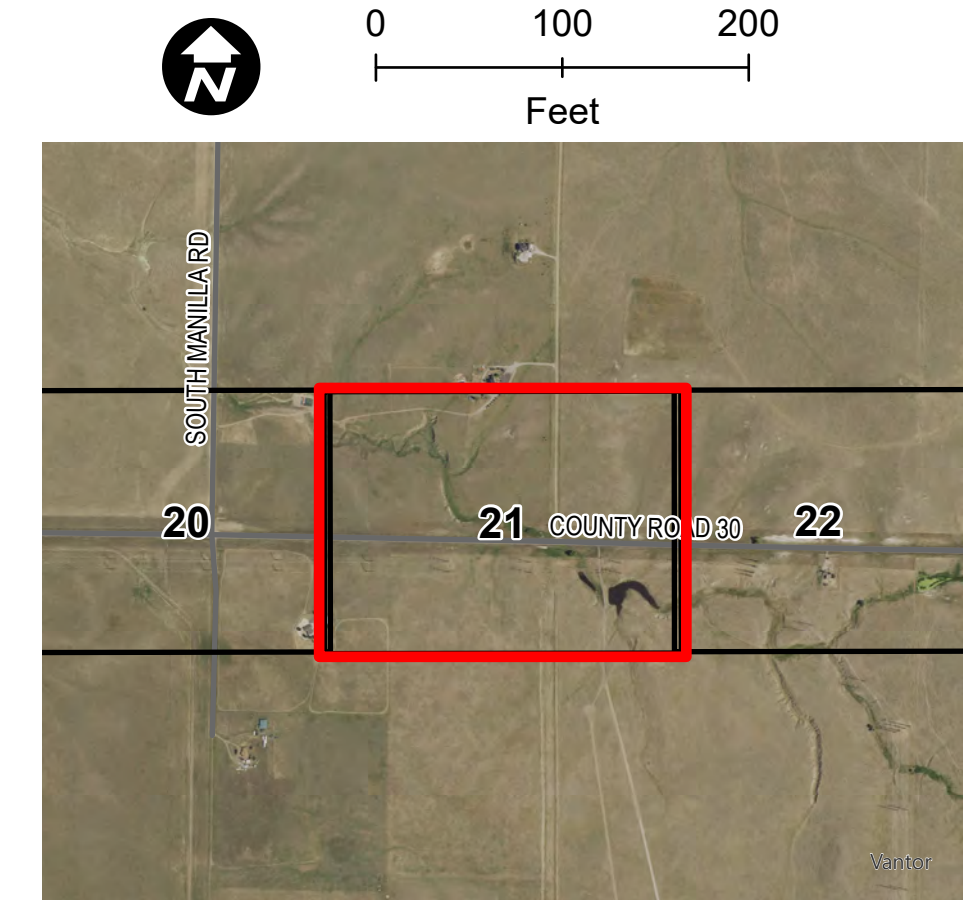
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

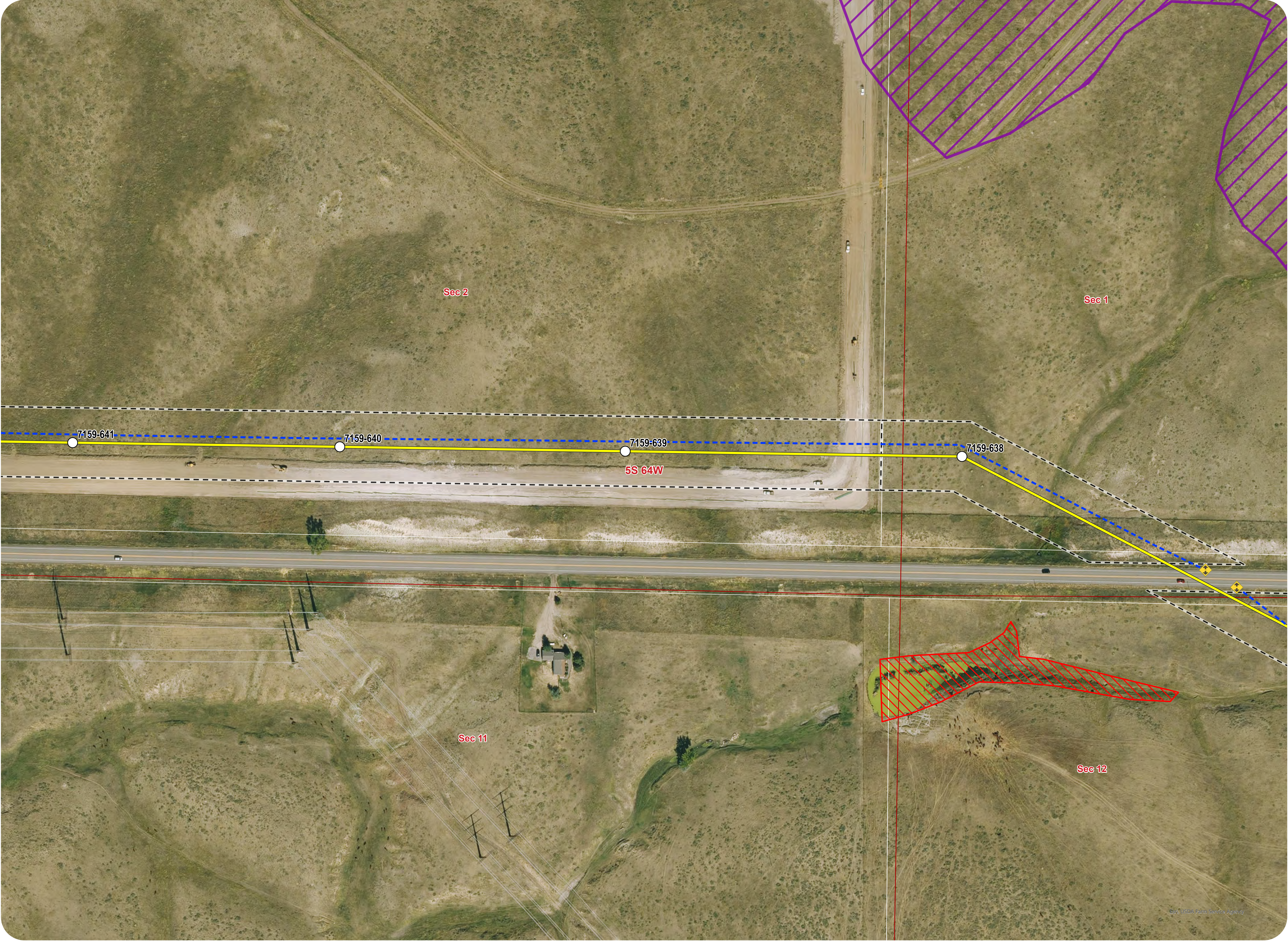
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COLORADO'S POWER PATHWAY



- Legend**
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Hydrology
(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System
(BLM 2020)

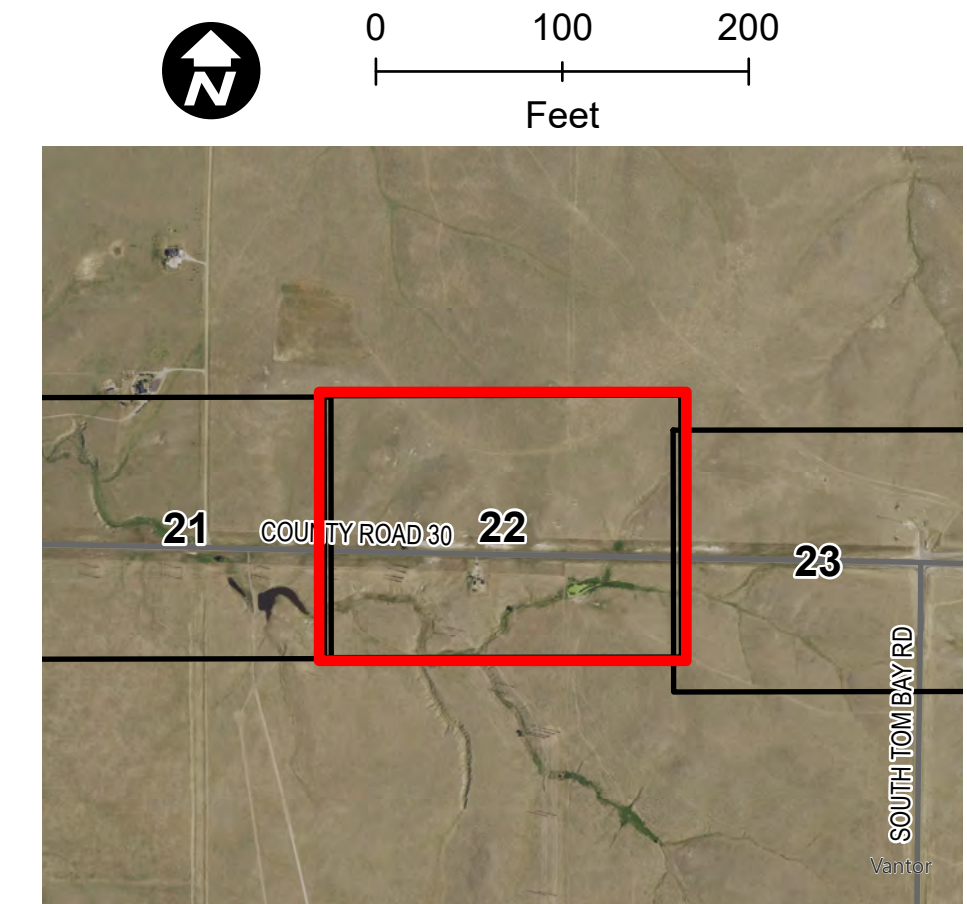
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Jurisdiction
(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

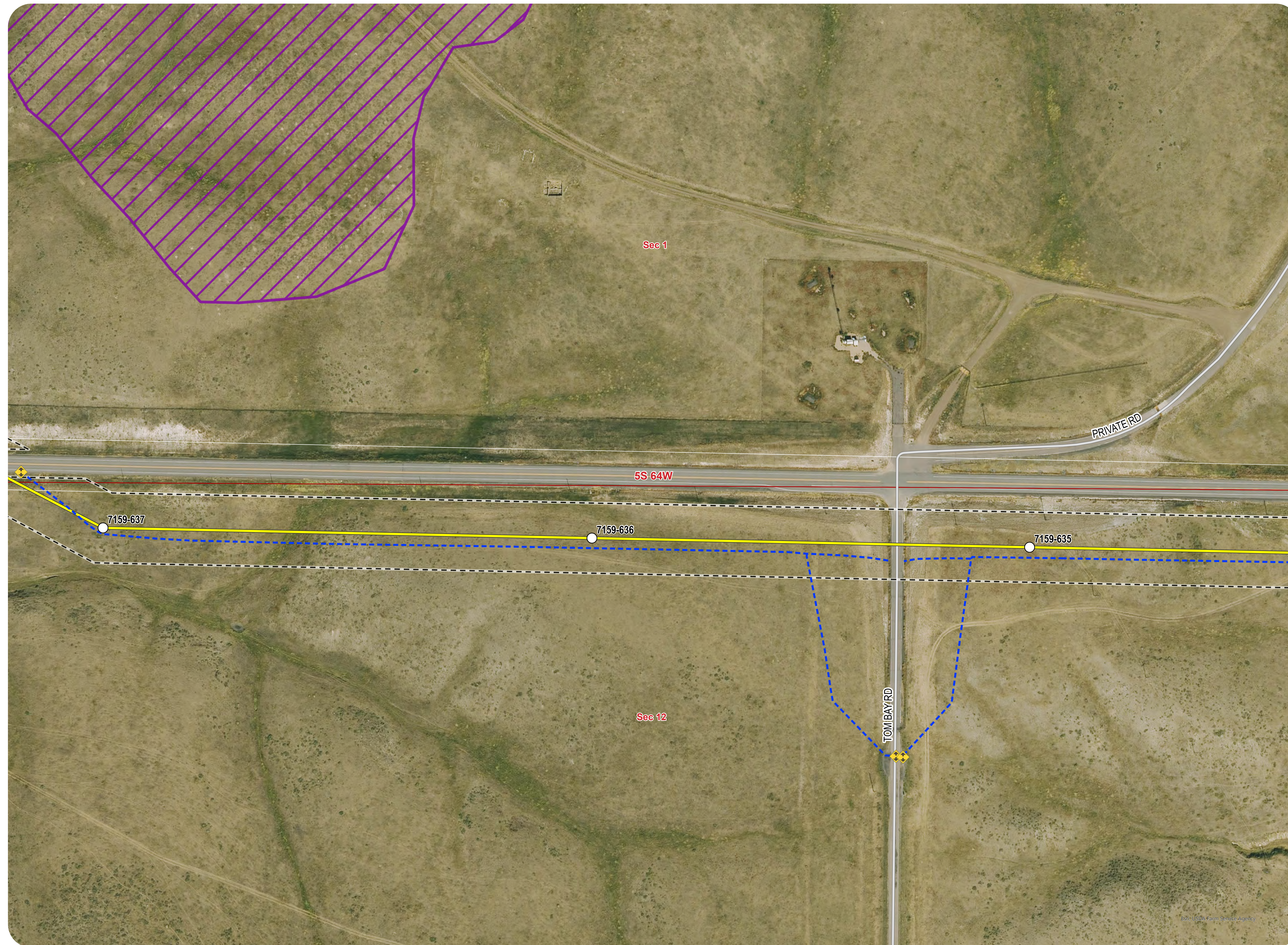
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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

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Public Land Survey System
(BLM 2020)

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 Township/Range

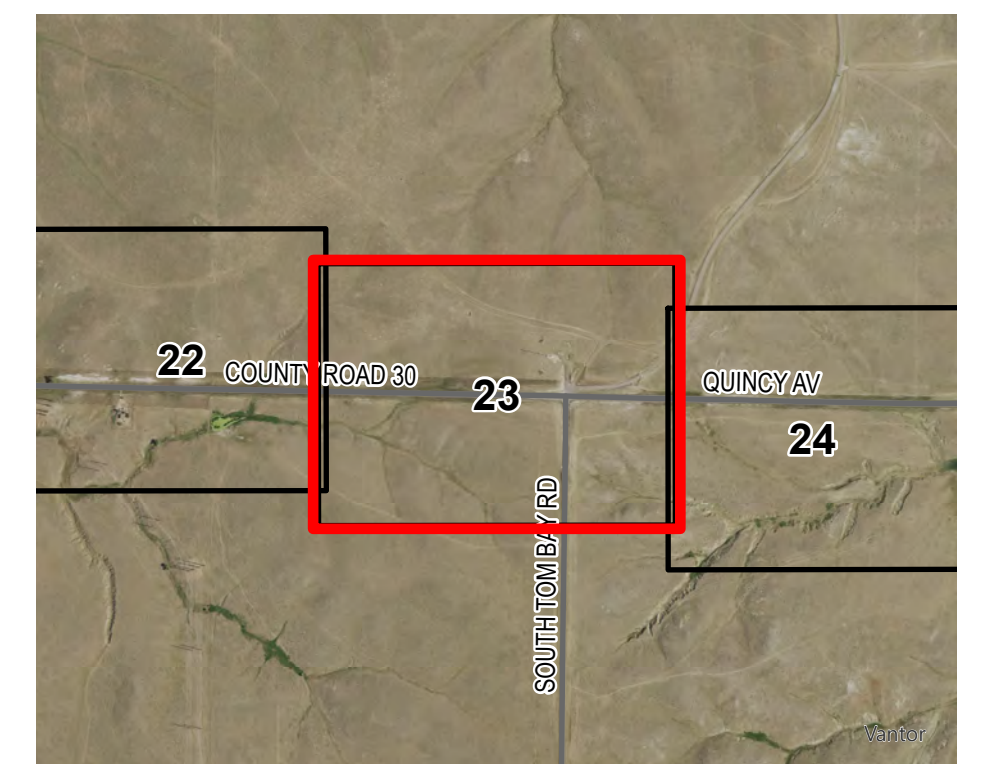
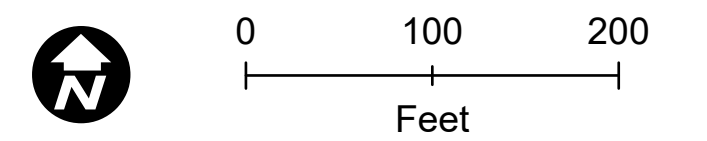
Jurisdiction

(COMap 2022, CO SLE

-  State
 CO State Stewardship

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COLORADO'S POWER PATHWAY



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Hydrology

(FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System

(BLM 2020)

- Section
- Township/Range

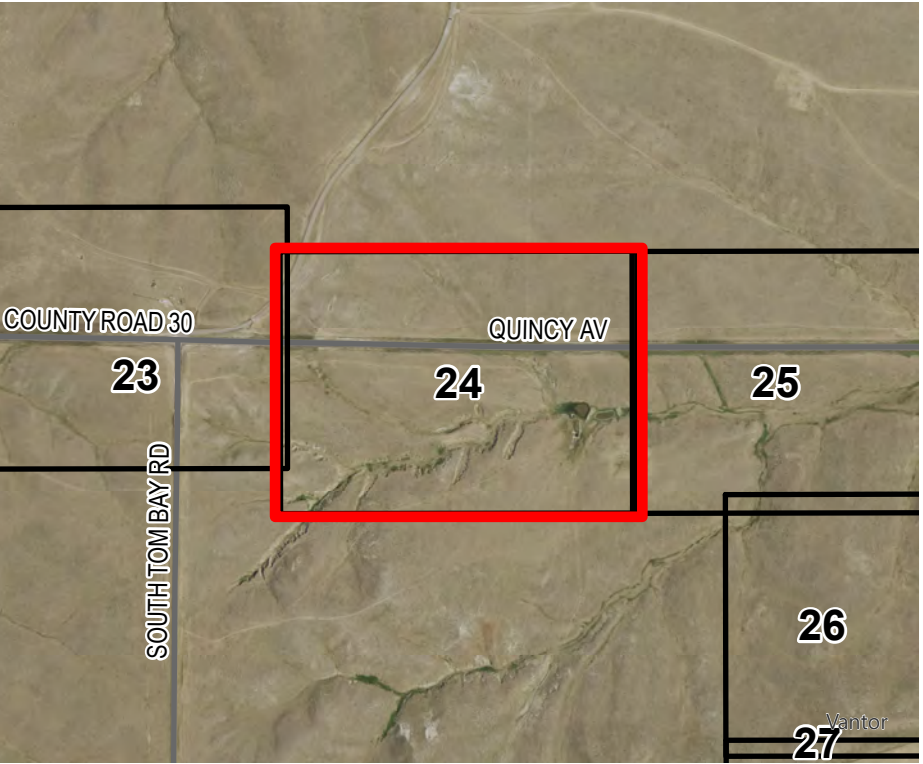
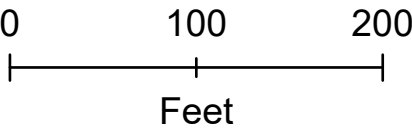
Jurisdiction

(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

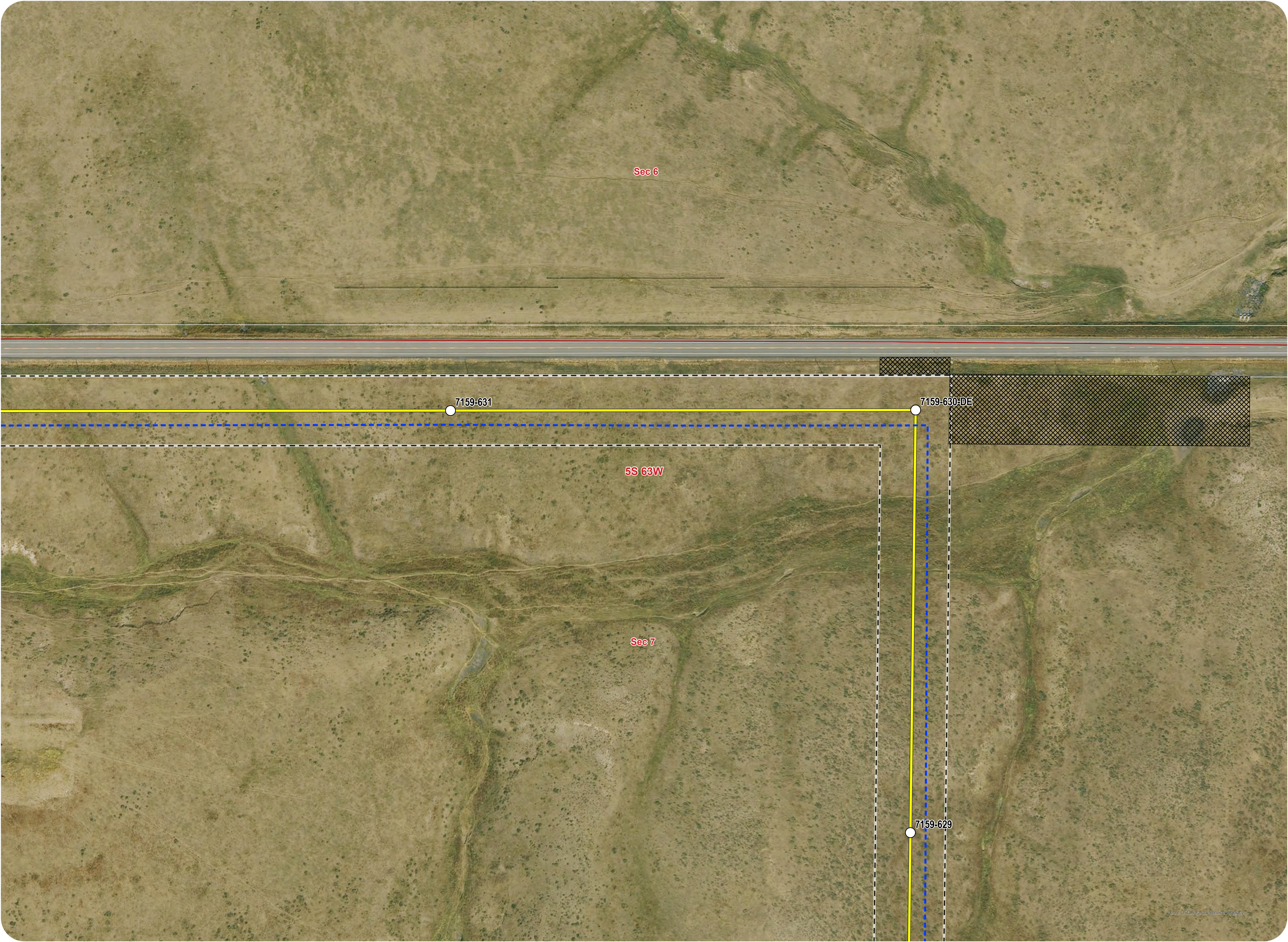
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COLORADO'S POWER PATHWAY



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Hydrology (FEMA 2024)

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Public Land Survey System (BLM 2020)

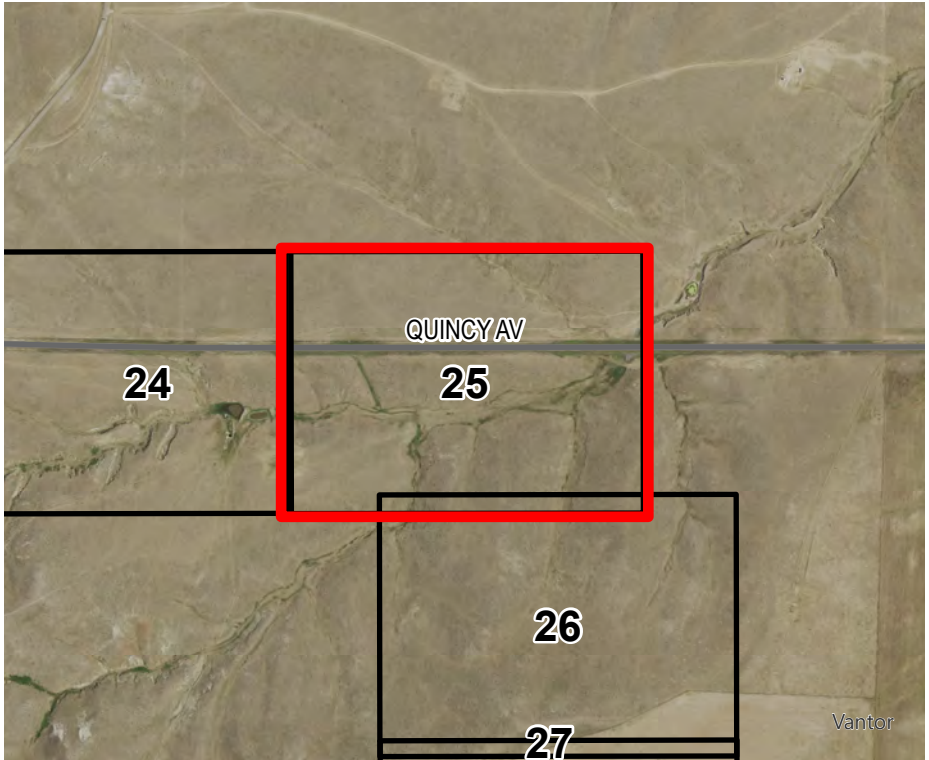
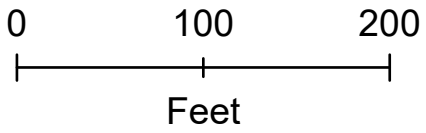
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

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- CO State Stewardship

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COLORADO'S POWER PATHWAY



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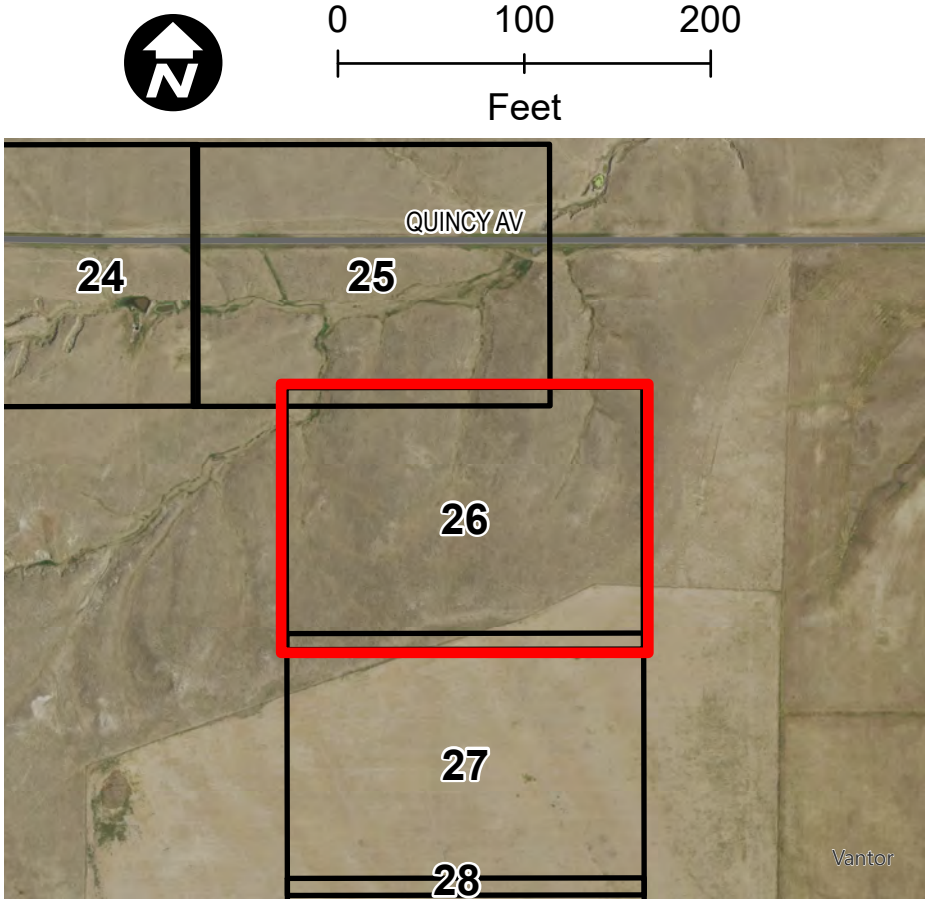
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Jurisdiction (COMap 2022, CO SLB 2023)

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- CO State Stewardship

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COLORADO'S POWER PATHWAY



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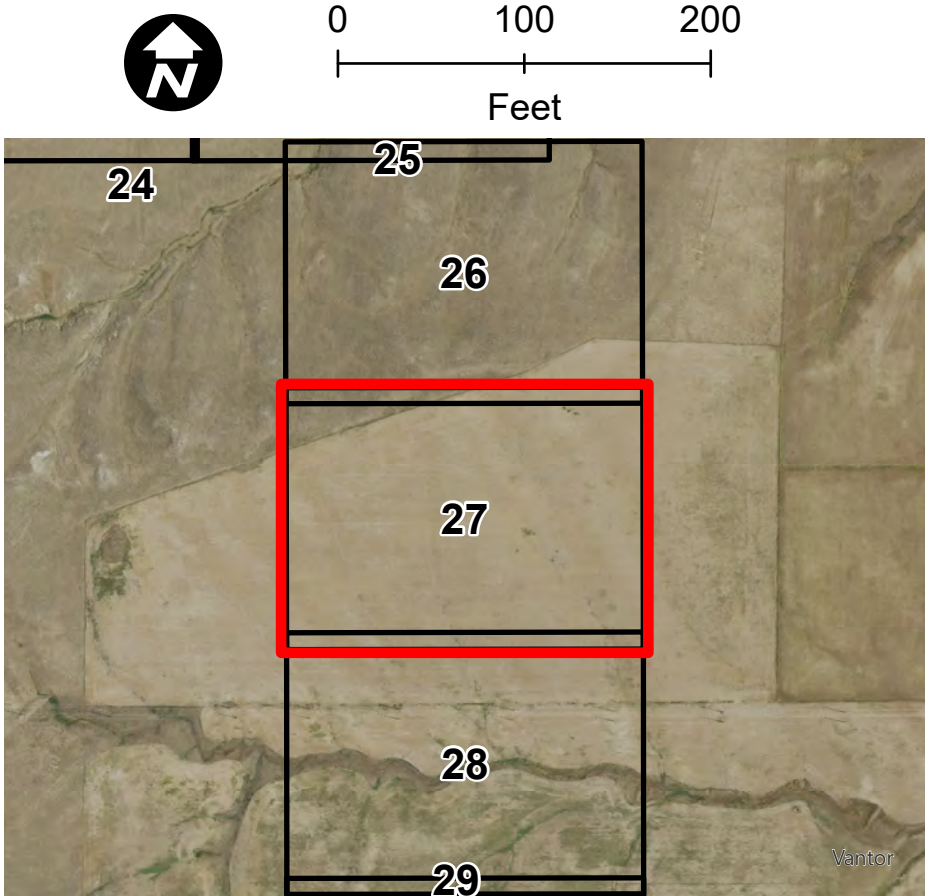
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

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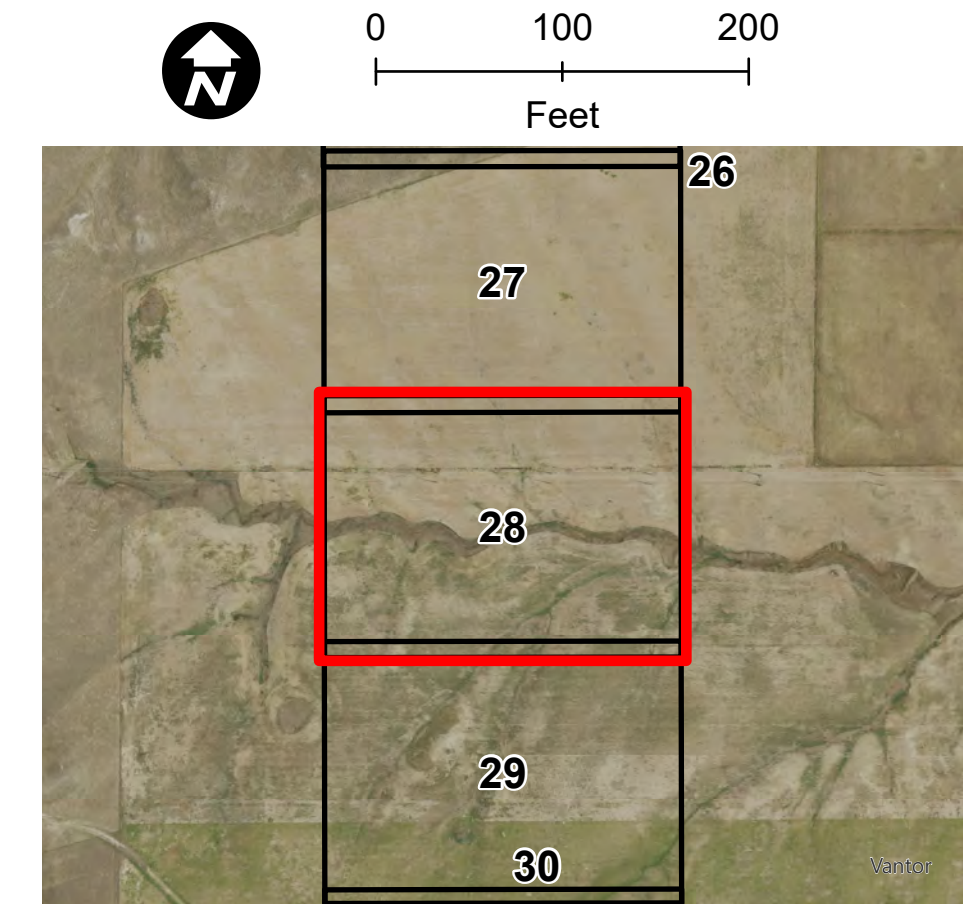
- Section
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Jurisdiction (COMap 2022, CO SLB 2023)

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Aerial - 2024 NAIP Imagery

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Public Land Survey System

(BLM 2020)

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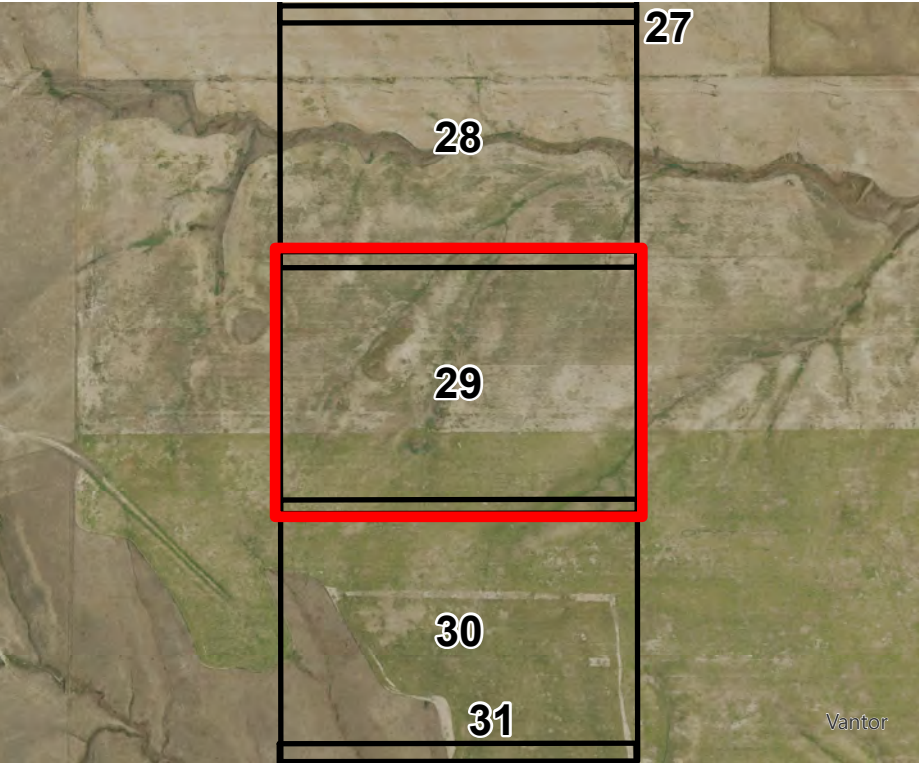
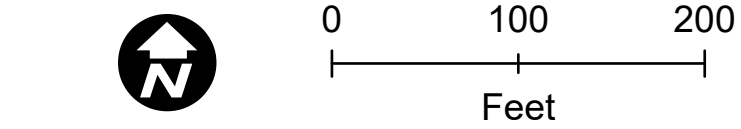
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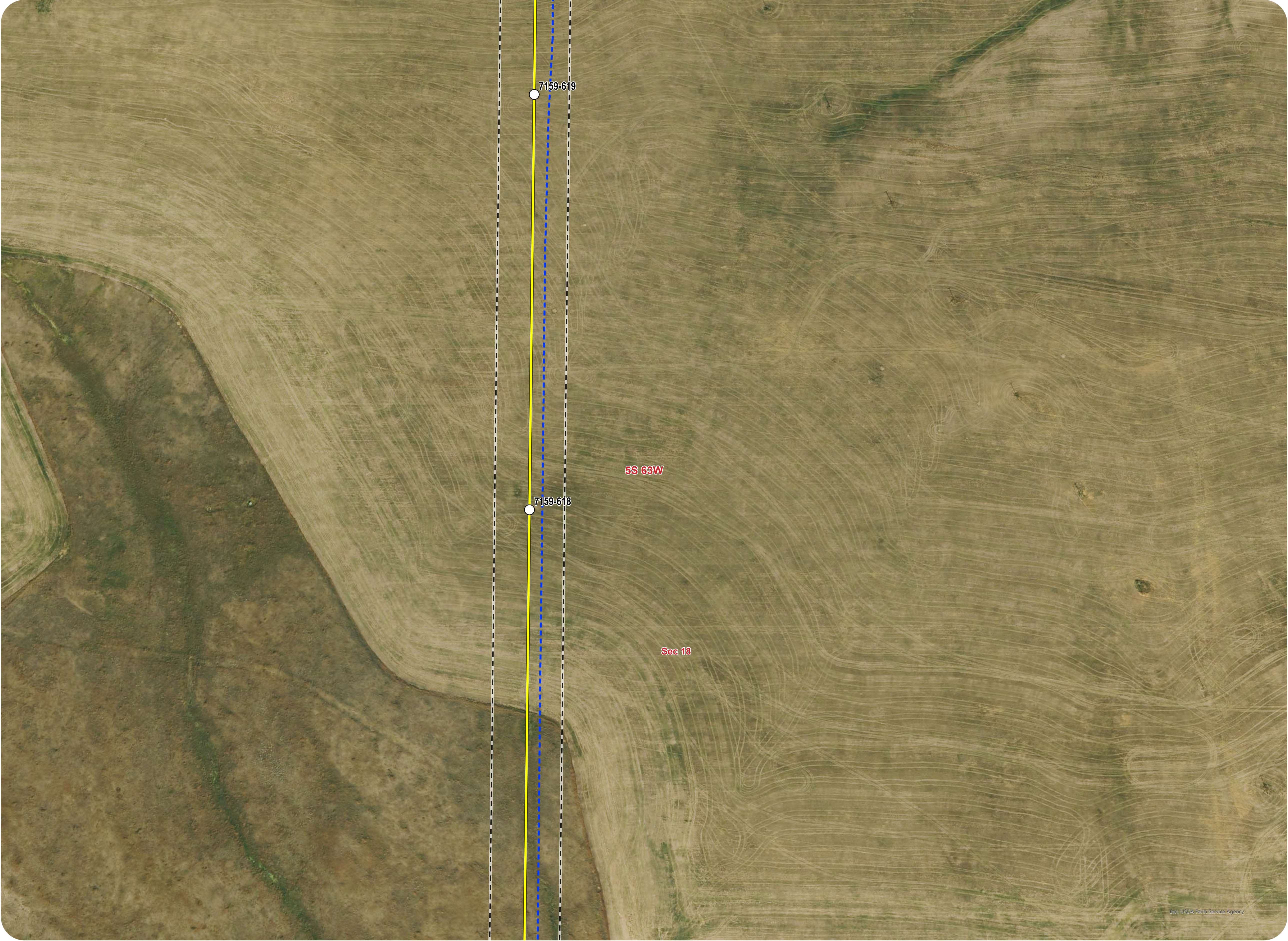
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COLORADO'S POWER PATHWAY



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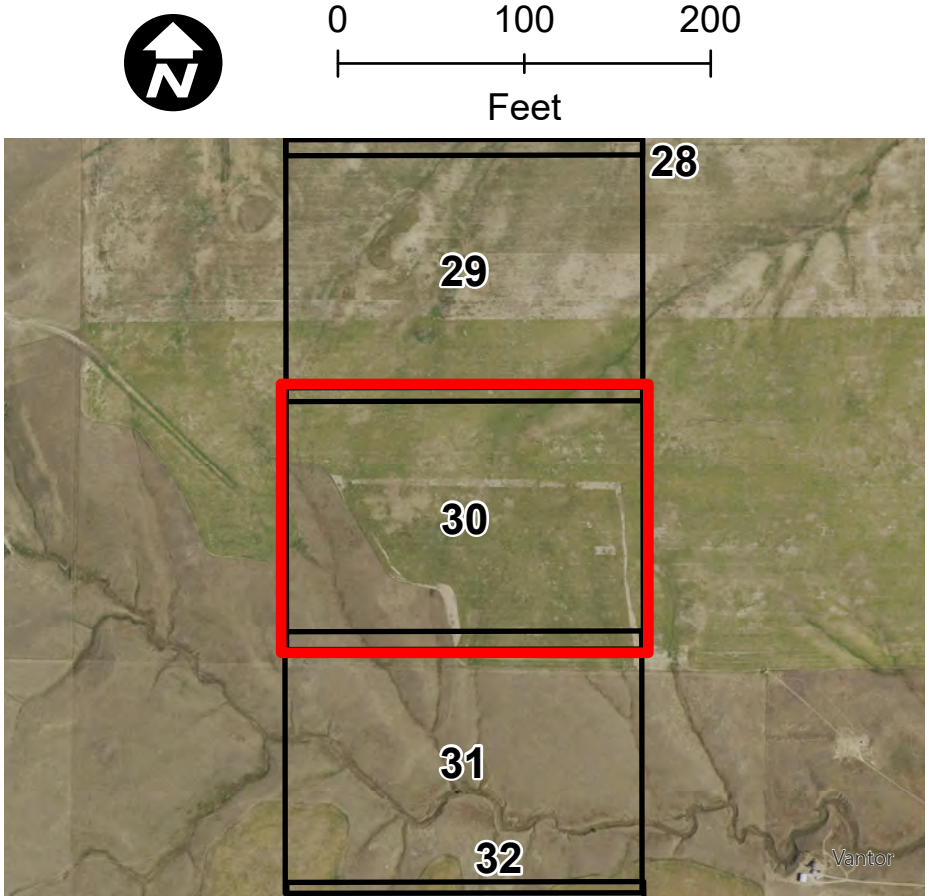
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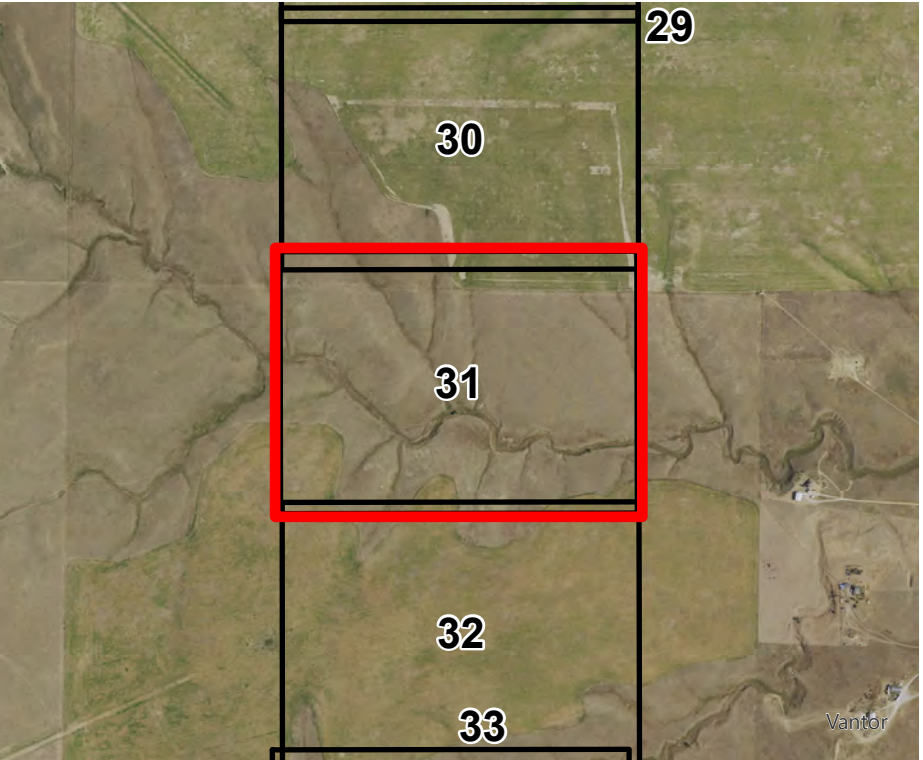
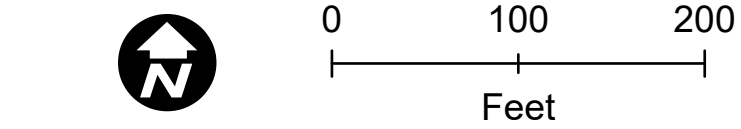
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Jurisdiction (COMap 2022, CO SLB 2023)

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- CO State Stewardship

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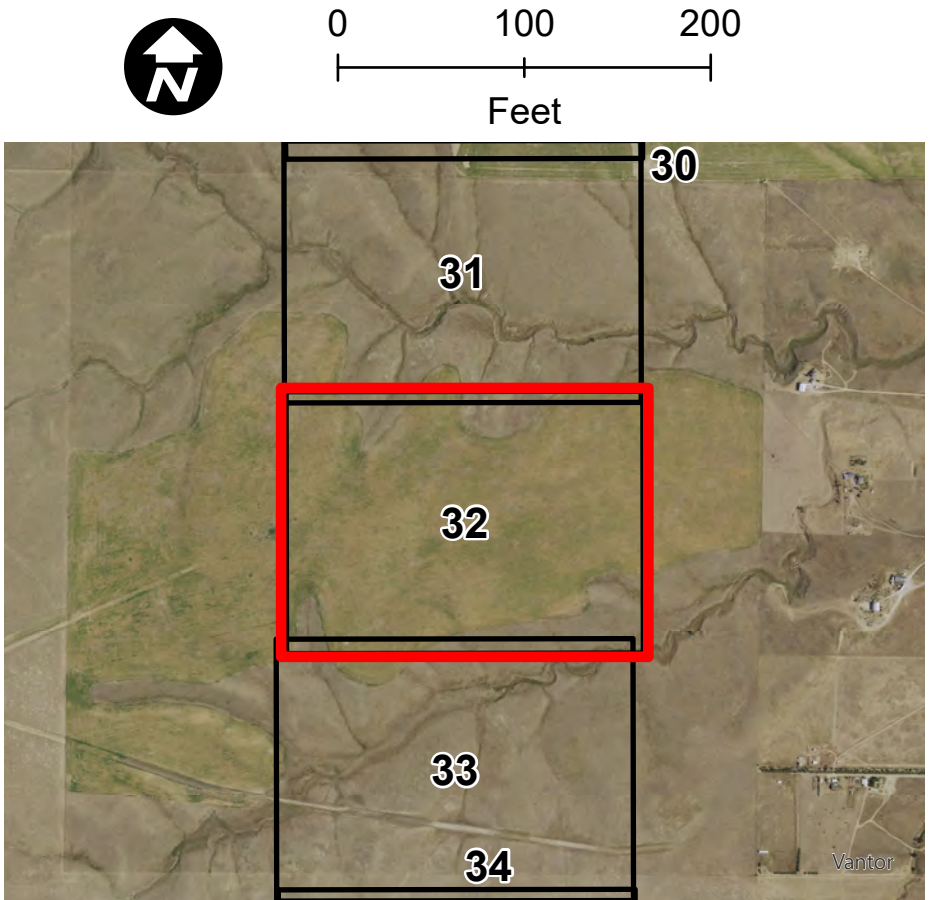
- Hydrology**
(FEMA 2024)
- 100-year FEMA Floodplain

- Public Land Survey System**
(BLM 2020)
- Section
 - Township/Range

- Jurisdiction**
(COMap 2022, CO SLB 2023)
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Hydrology (FEMA 2024)

- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

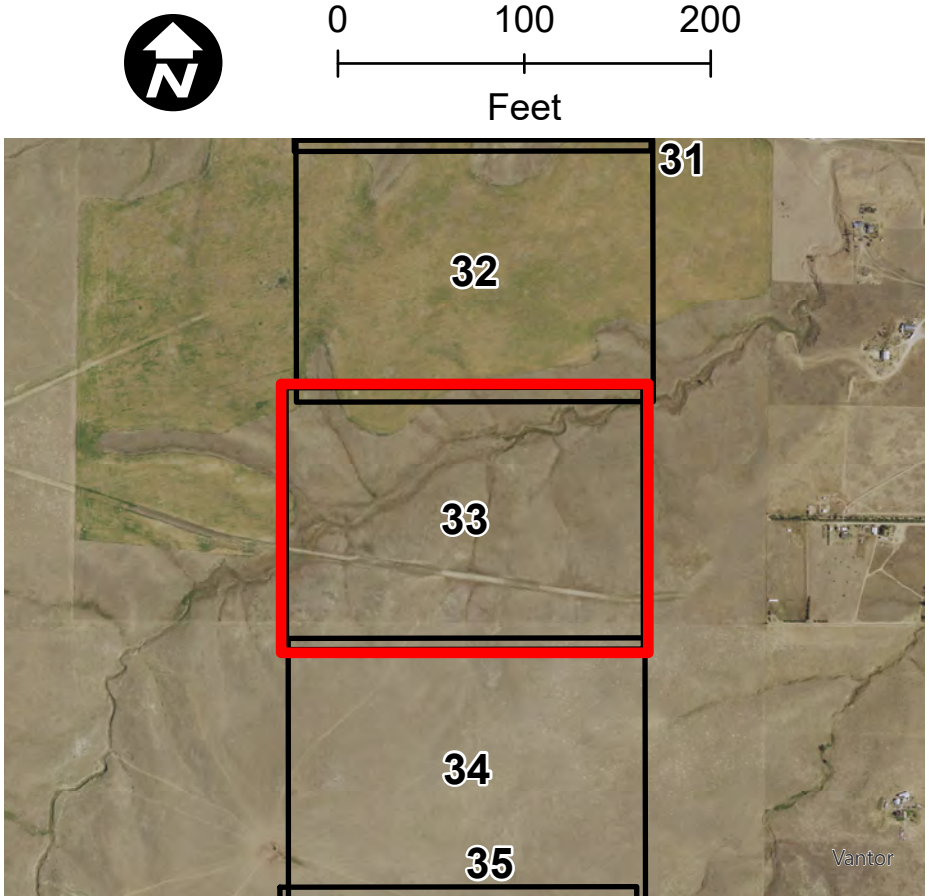
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

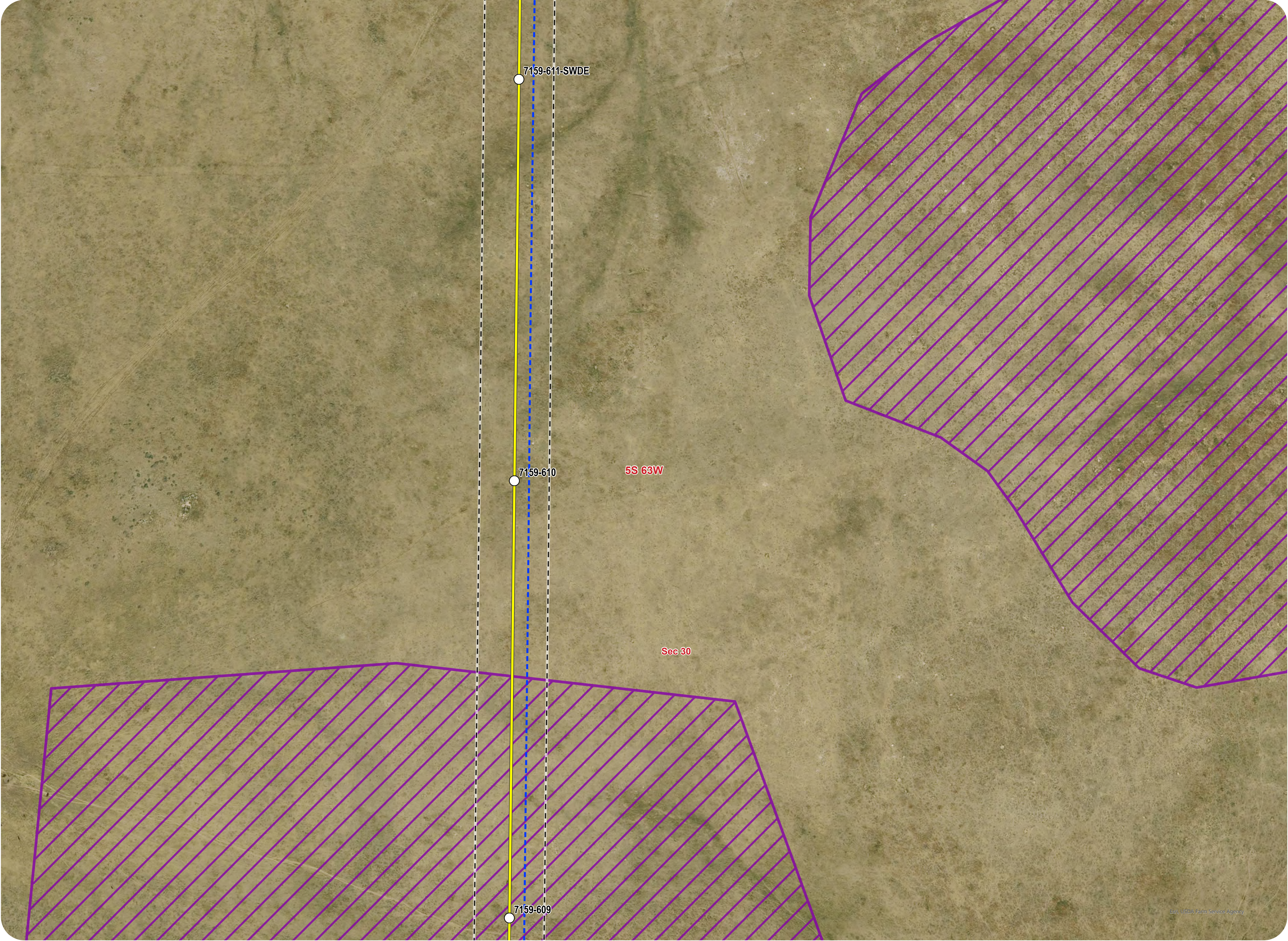
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COLORADO'S POWER PATHWAY



Legend

- Preliminary Structure Location
- Preferred Transmission Route
- Access Road
- Proposed 150-foot ROW
- Pull Site
- Access Point Location
- City of Aurora
- Trail
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- 100-year FEMA Floodplain

Public Land Survey System (BLM 2020)

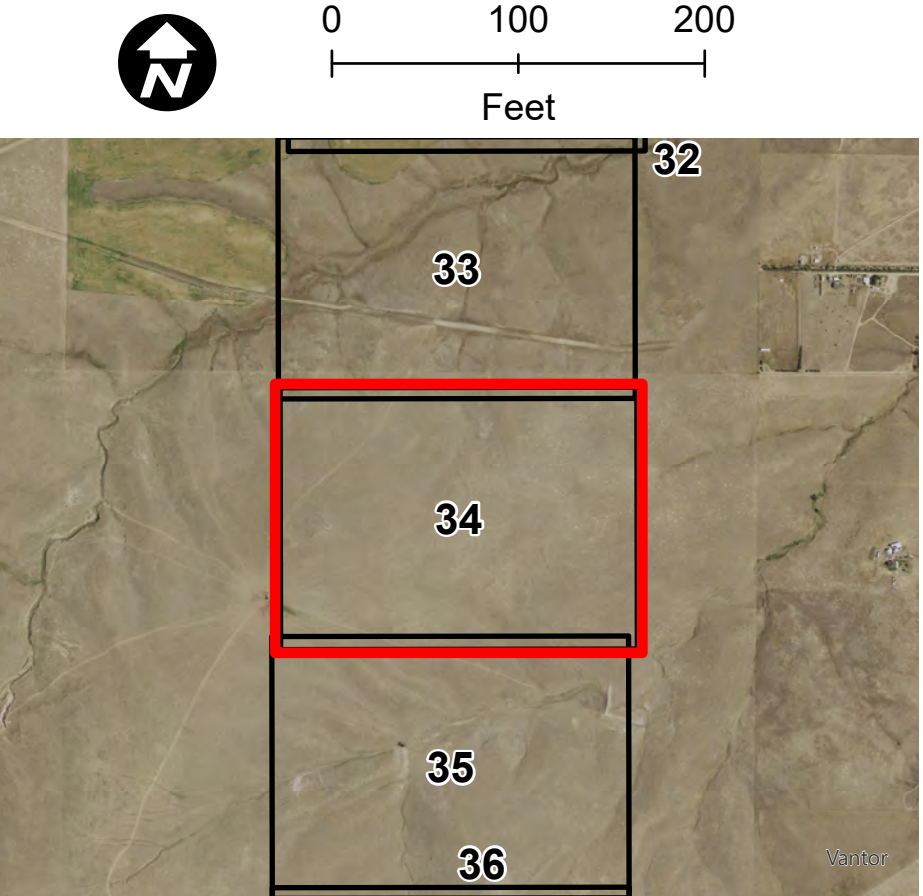
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

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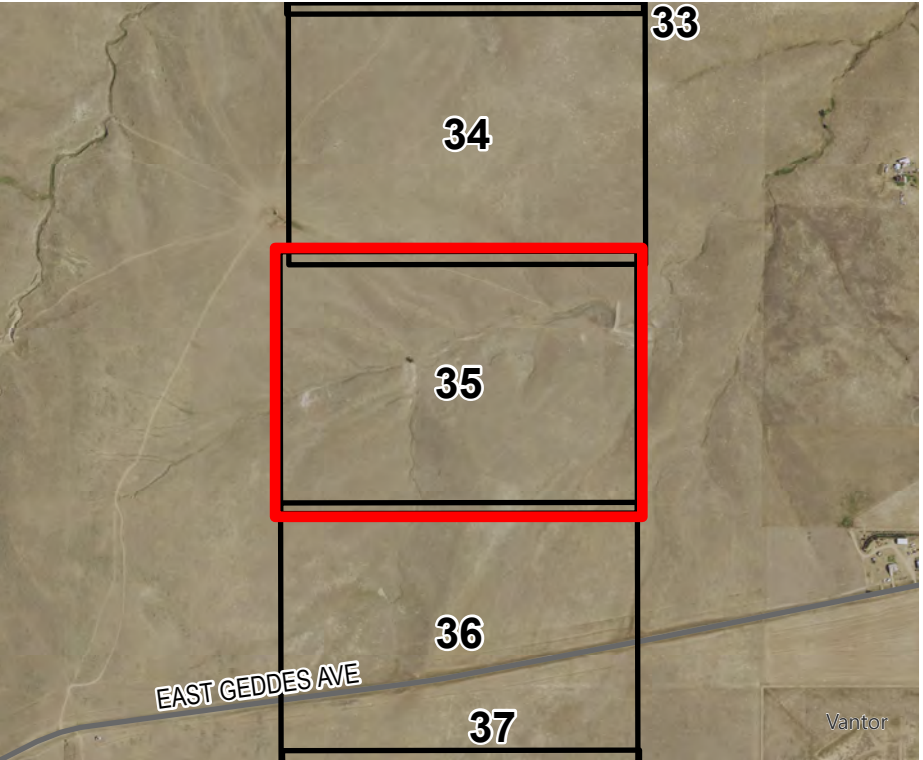
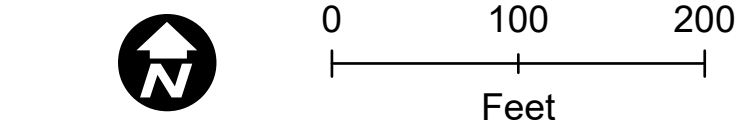
Jurisdiction

(COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

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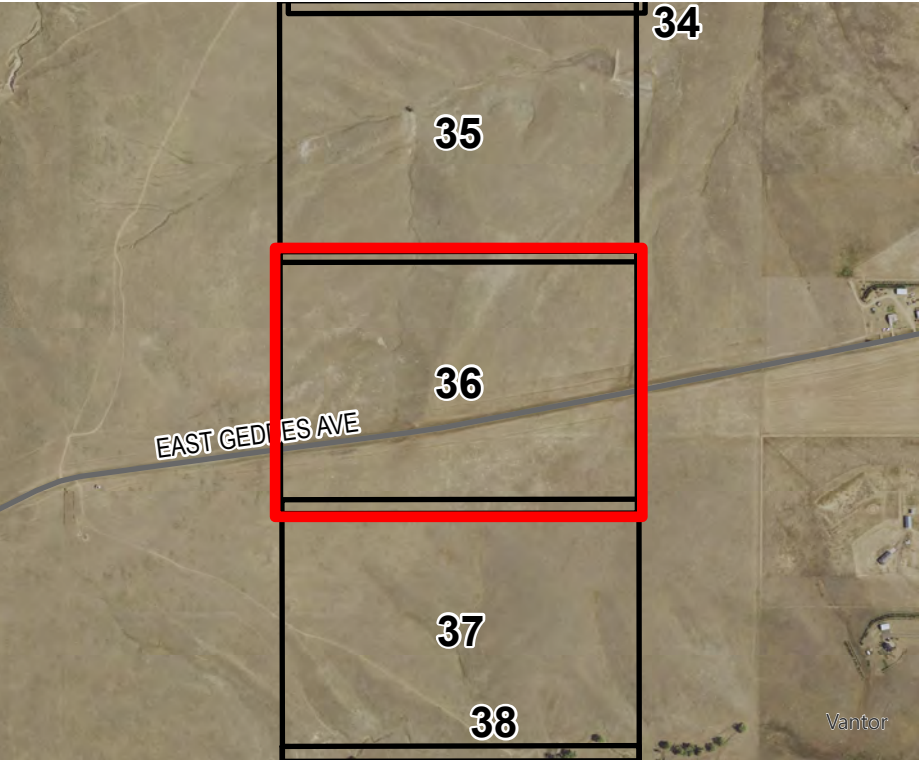
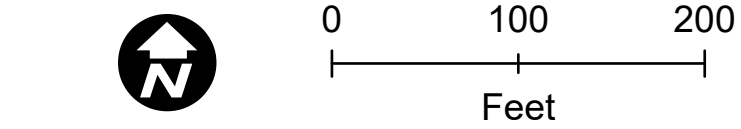
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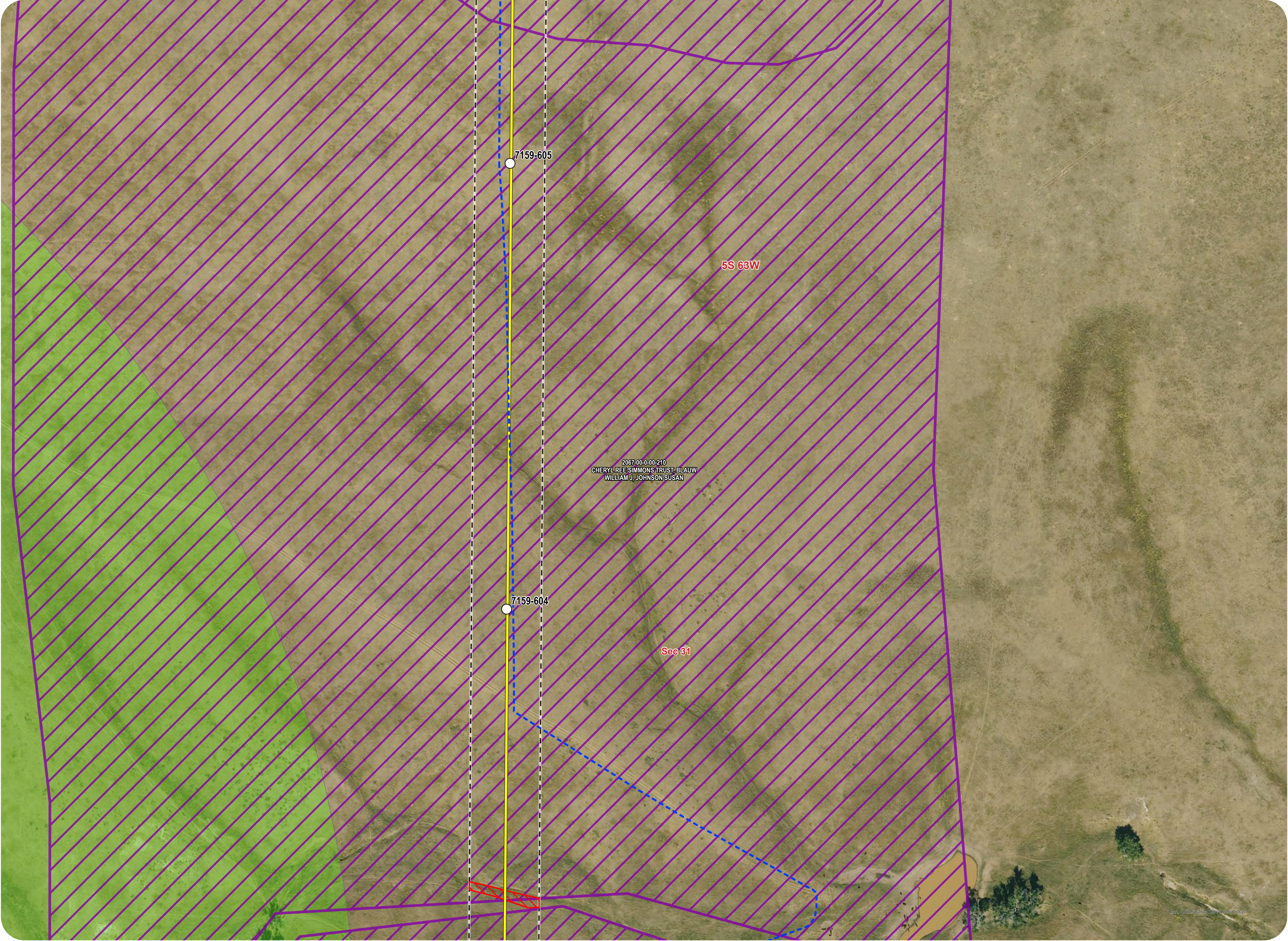
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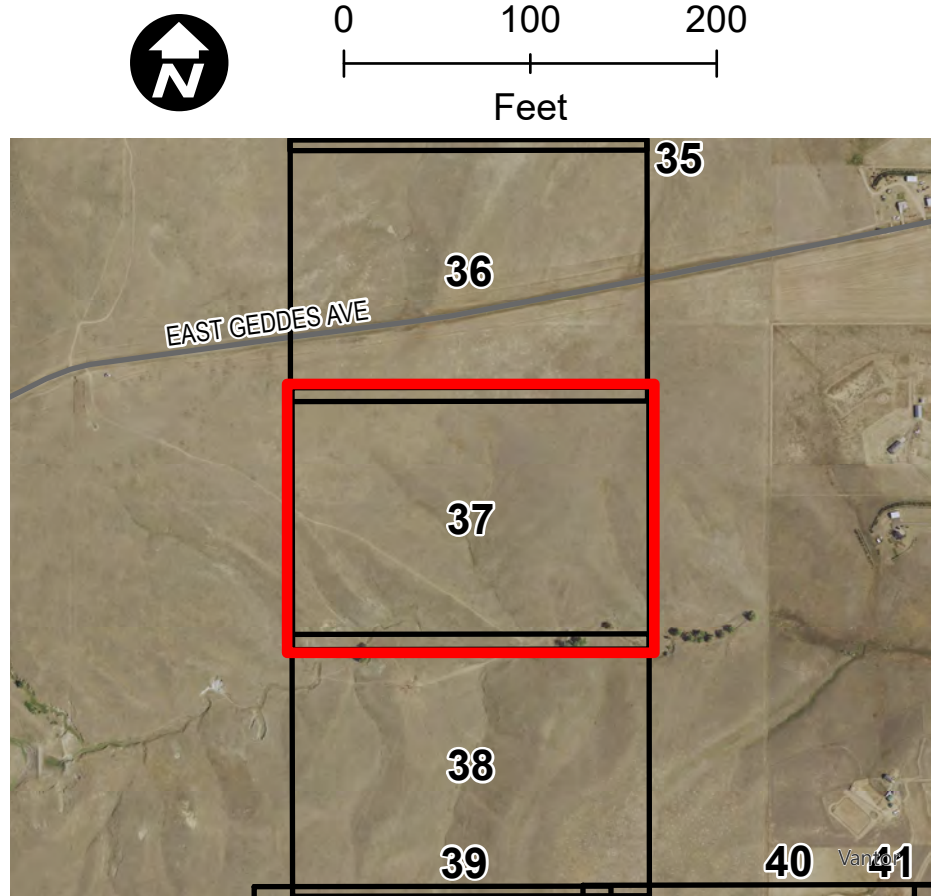
- Section
- Township/Range

Jurisdiction (COMap 2022, CO SLB 2023)

- State
- CO State Stewardship

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COLORADO'S POWER PATHWAY



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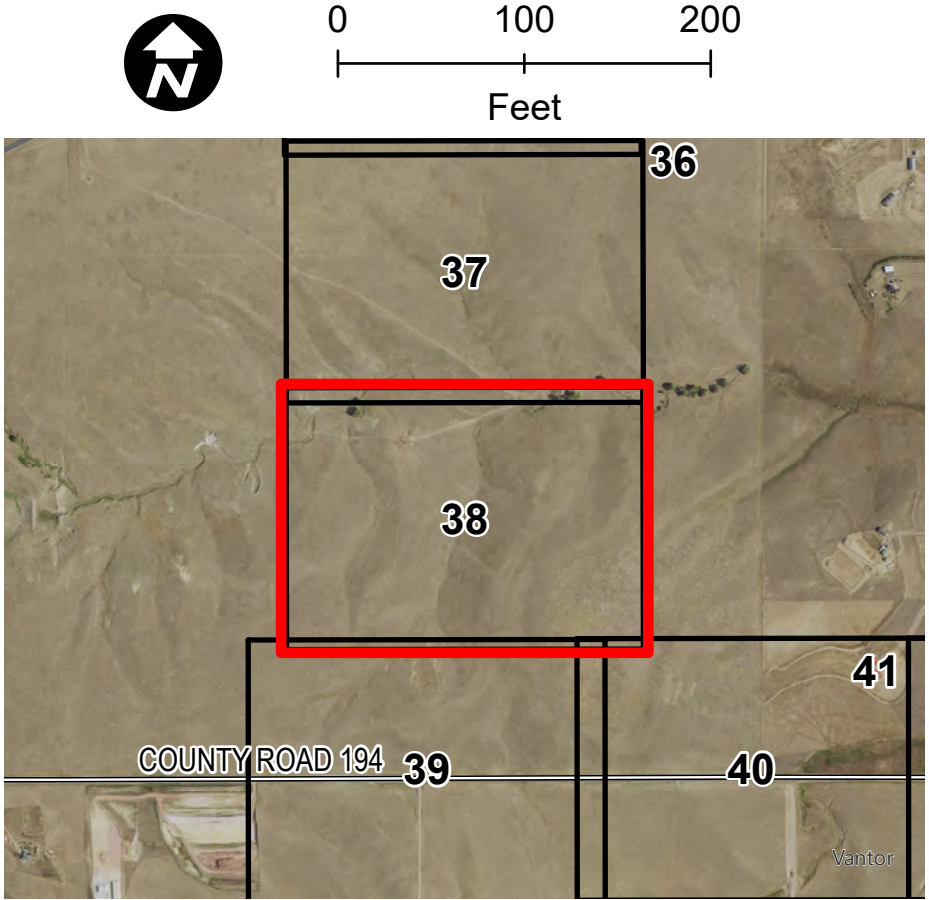
- Hydrology**
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- Public Land Survey System**
(BLM 2020)
- Section
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- Jurisdiction**
(COMap 2022, CO SLB 2023)
- State
 - CO State Stewardship

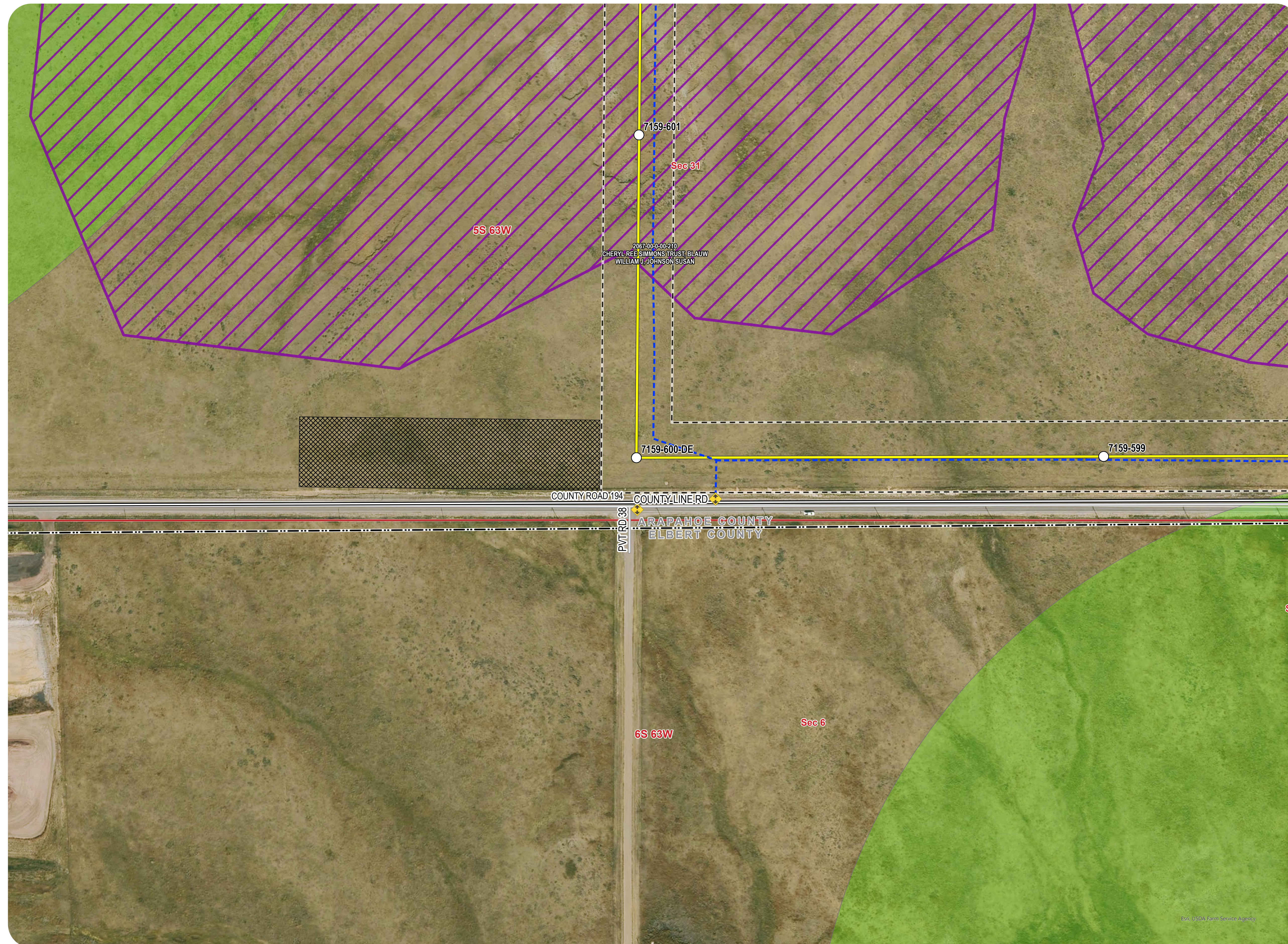
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(FEMA 2024)

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Public Land Survey System
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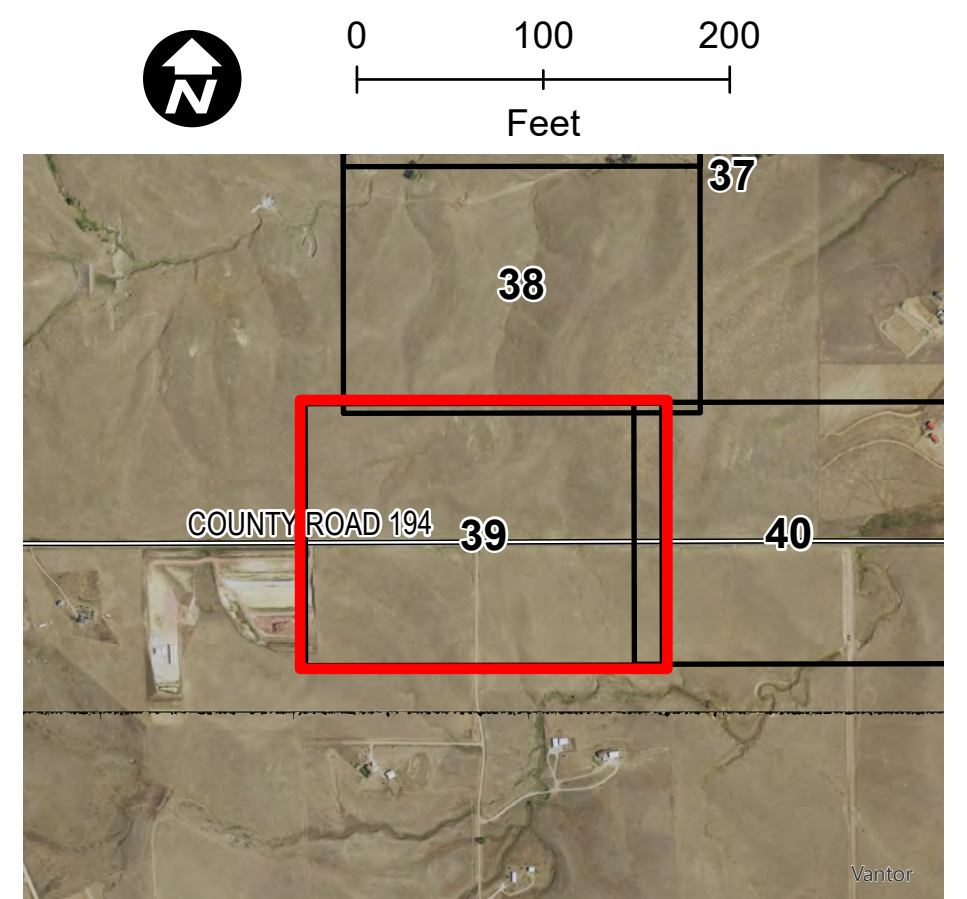
Jurisdiction

(COMap 2022, CO SLE

-  State
 CO State Stewardship

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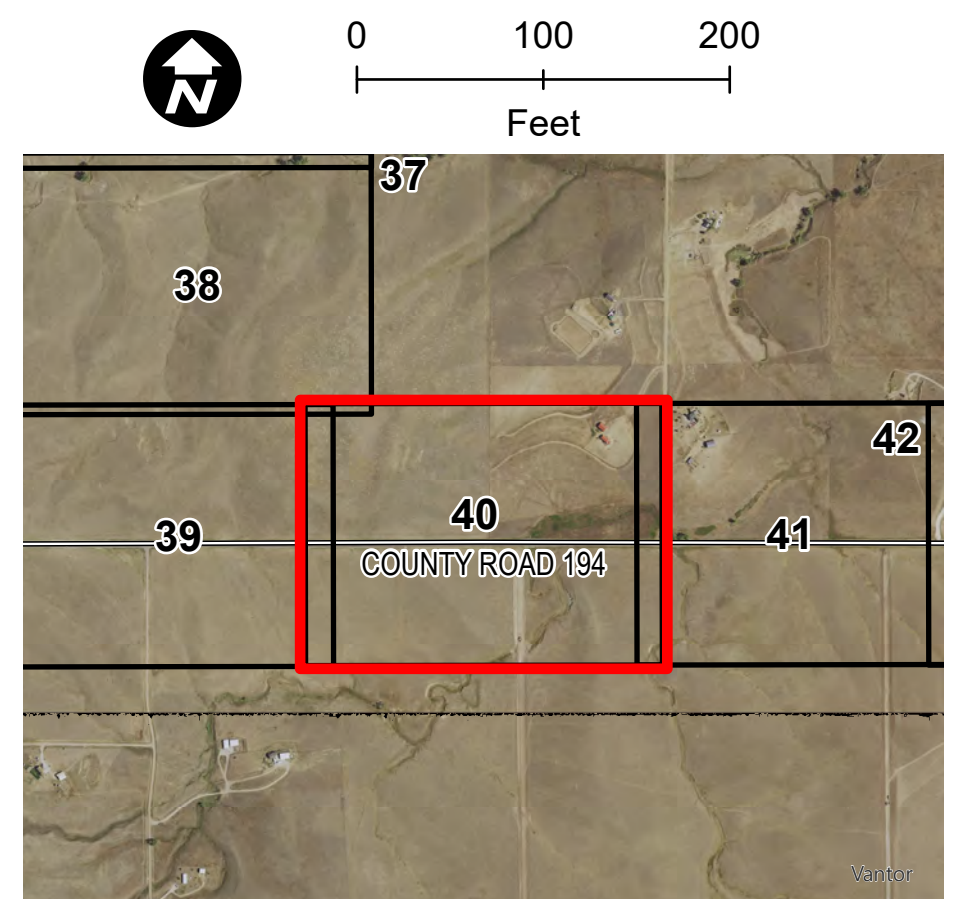
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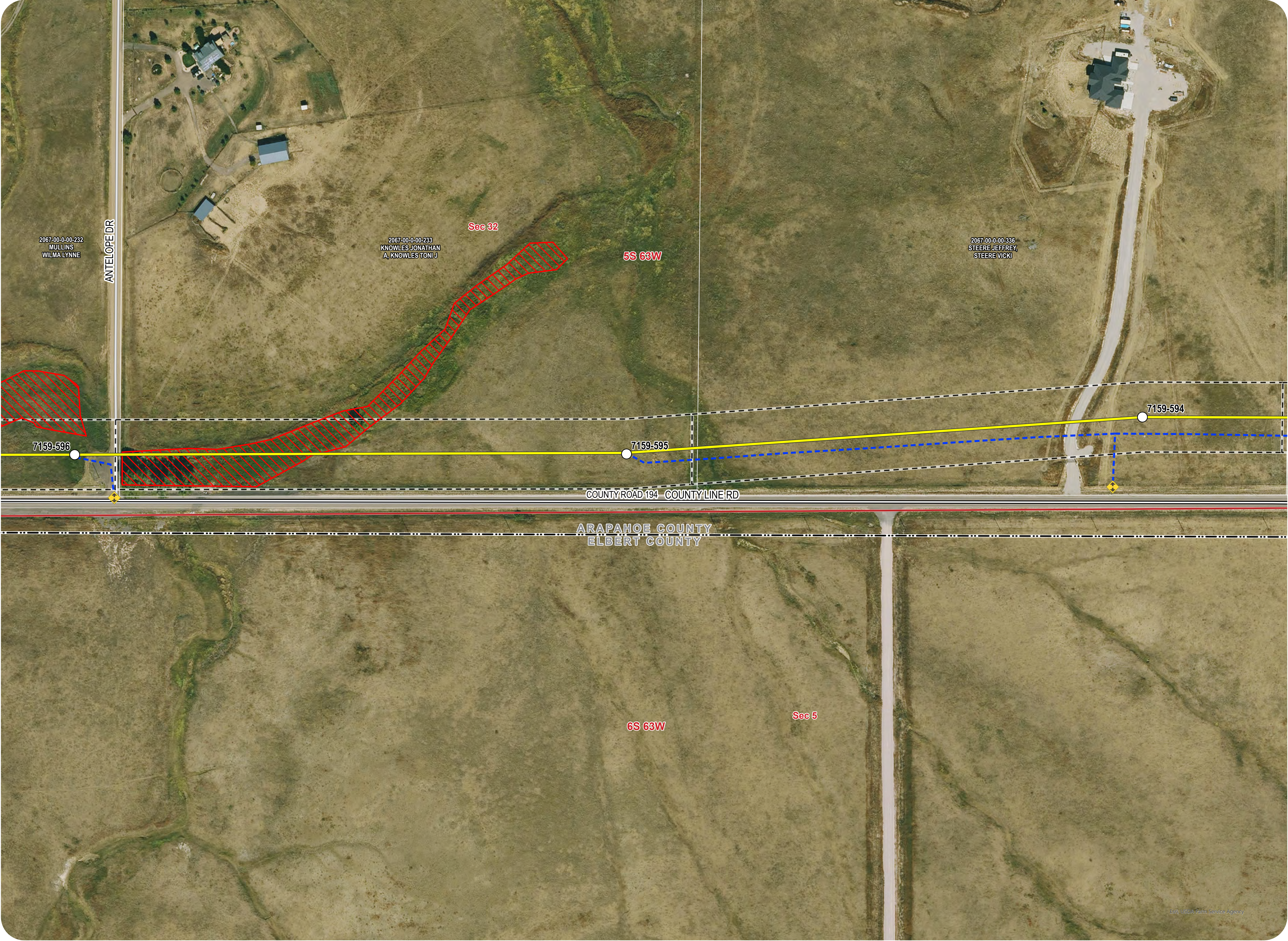
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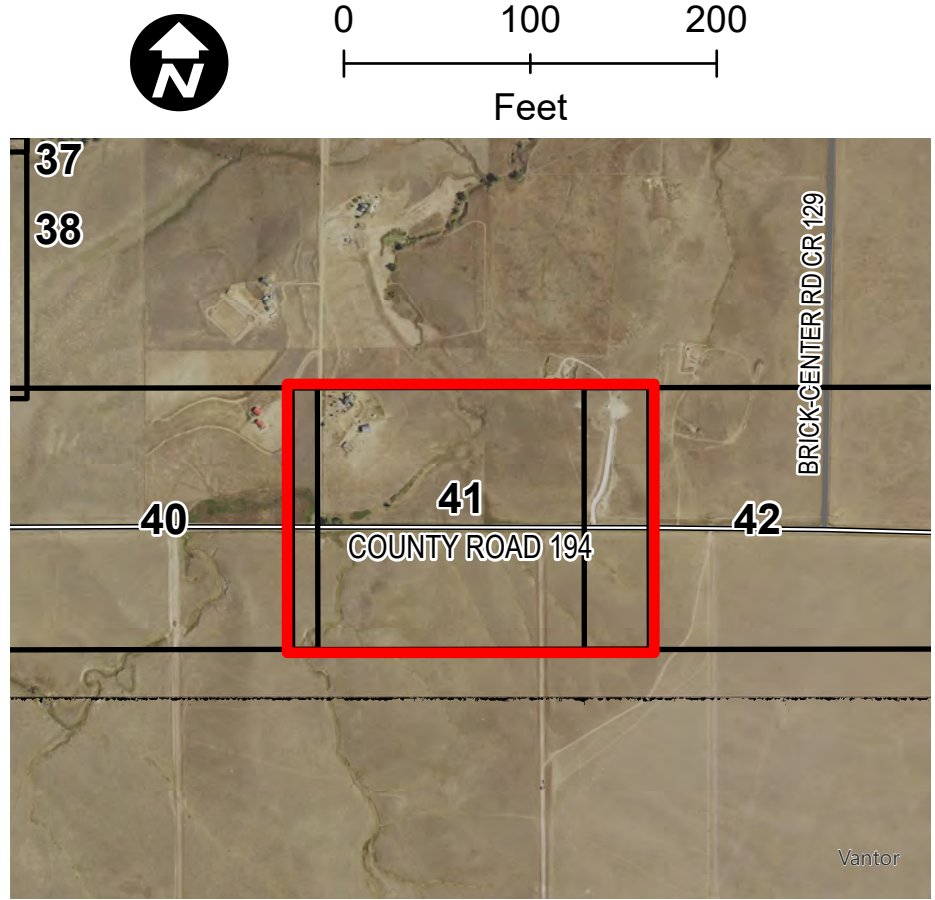
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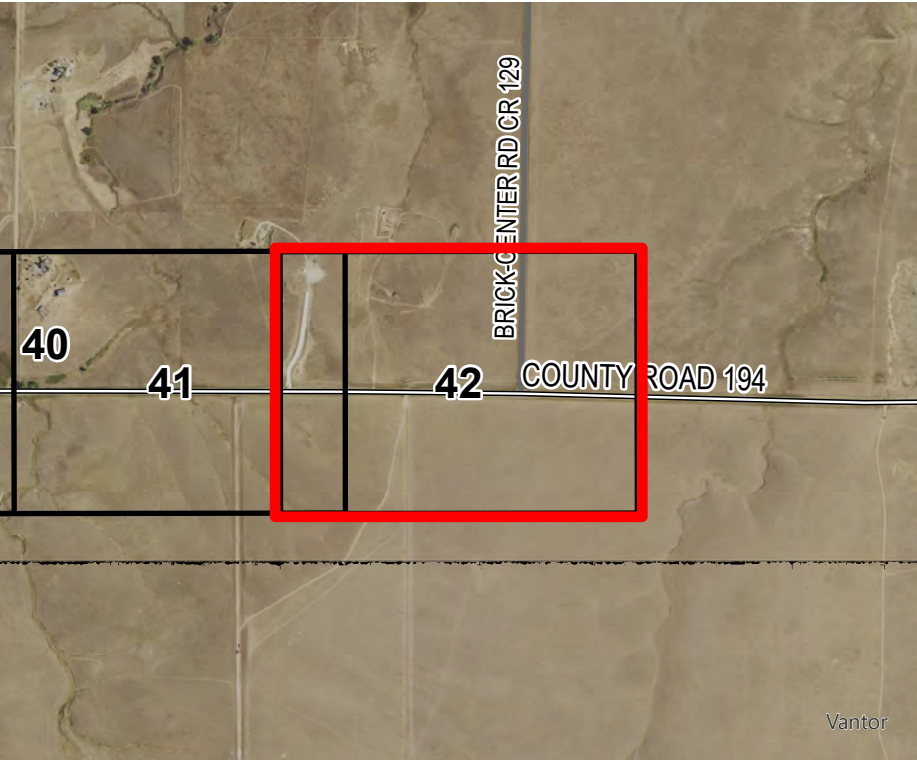
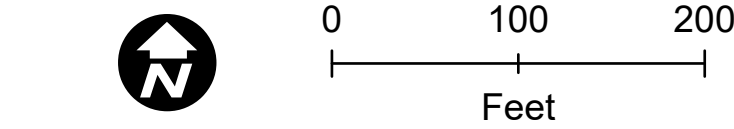
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