

**PATHWAY CONSISTENCY WITH ARAPAHOE COUNTY  
COMPREHENSIVE PLAN**

**CONTENTS**

INTRODUCTION..... 1

GROWTH MANAGEMENT POLICIES..... 1

    GOAL GM 1 – Ensure a Compact Land Development Pattern..... 1

        Policy GM 1.2 – Implement the Comprehensive Plan in a Manner that Respects the Rights of Property Owners and the Community ..... 1

        Policy GM 1.3 – Promote Environmental Justice ..... 2

    GOAL GM 3 – Reduce the Loss of Life, Health and Property Due to Risks Posed by Natural and Human caused Hazards..... 3

        Policy GM 3.1 – Direct Future Development to Areas with Low Risks from Natural and Human-caused Hazards..... 3

        Policy GM 3.4 – Prepare for Recovery from Disasters..... 3

        Policy GM 3.5 – Protect Existing and New Development from Human-caused Hazards..... 4

PUBLIC FACILITIES AND SERVICES POLICIES ..... 5

    GOAL PFS 6 – Ensure the Adequacy of Electric, Natural Gas, Telephone, Cable and Internet Utilities in Existing and New Development ..... 5

        Policy PFS 6.1 – Continue Collaboration with Utility Companies in the Development Review Process ..... 5

    GOAL PFS 7 – Ensure Existing and New Development have Adequate Police and Fire Protection ..... 5

        Policy PFS 7.1 – Continue Collaboration with Service Providers to Ensure an Adequate Level of Service Is Provided to Existing and New Development..... 5

    GOAL PFS 8 – Provide Rapid and Comprehensive Response to Natural Disasters..... 6

        Policy PFS 8.1 – Ensure an Effective Emergency Response Program..... 6

    GOAL PFS 12 – Minimize Impacts of Local and Regional Public Facilities and Utility Facilities..... 7

        Policy PFS 12.1 – Thoroughly Evaluate Development of Public Facilities ..... 7

        Policy PFS 12.2 – Consider Utility Needs to Support Growth and Development of the Region ..... 8

        Policy PFS 12.3 – Require Land Use Compatibility when Siting Local and Regional Utility Facilities ..... 9

    GOAL PFS 13 – Divert a Larger Portion of Waste from Landfills ..... 9

Policy PFS 13.1 – Implement Measures to Reduce Waste in Landfills..... 9

NEIGHBORHOOD LIVABILITY POLICIES ..... 10

GOAL NL 1 – Create Livable MIXED-USE Neighborhoods in Designated Growth Areas..... 10

Policy NL 1.5 – Encourage New Development and Redevelopment to Incorporate Environmentally Sustainable Development Techniques and Energy Conservation Measures..... 10

GOAL NL 2 – Ensure Compatibility between New Development and Existing Neighborhoods ..... 10

Policy NL 2.1 – Require New Development to be Compatible with Existing Residential Neighborhoods ..... 10

GOAL NL 3 – Ensure New Development and Redevelopment Provides Opportunities for Healthy Living..... 11

Policy NL 3.1 – Encourage Development That Supports Healthy Communities ..... 11

Policy NL 3.6 – Undertake Measures to Increase Public Safety ..... 11

Policy NL 3.7 – Minimize Impacts to Property from Human-caused Hazards ..... 12

GOAL NL 5 – Develop a Countywide Open Space, Parks and Trails System..... 13

Policy NL 5.1 – Implement Actions to Create a Countywide System of Connected Open Space, Public Parks and Trails ..... 13

ECONOMIC HEALTH POLICIES ..... 14

GOAL EH 1 – Expand the County’s Existing Economic Base ..... 14

Policy EH 1.1 – Retain and Promote Existing Industrial Lands in Designated Growth Areas..... 14

Policy EH 1.2 – Encourage Environmentally Friendly Businesses and Jobs in Arapahoe County..... 14

Policy EH 1.3 – Encourage Community-based Economic Development and Revitalization ..... 14

GOAL EH 4 – Achieve Fiscal Sustainability..... 16

Policy EH 4.1 – Consider New Revenue Sources to Help Balance Revenues with Ongoing Infrastructure and Maintenance Costs ..... 16

Policy EH 4.3 – Ensure a Balanced Mix of Land Uses..... 17

GOAL EH 5 – Develop the Tourism Industry in Arapahoe County ..... 17

Policy EH 5.1 – Support the Designation of Cultural Resource Landmarks or Districts on Local, State or National Registers..... 17

TRANSPORTATION AND MOBILITY POLICIES ..... 18

    GOAL TM 1 – Promote an Efficient and Balanced Transportation System..... 18

        Policy TM 1.2 – Establish Long-Term Road Maintenance and  
Transportation System Improvement Priorities ..... 18

        Policy TM 1.3 – Require Connectivity and Continuity in Local and  
Regional Roads to Minimize Unnecessary Driving and Increase Safety..... 18

    GOAL TM 2 –Promote Alternative Transportation Solutions ..... 18

        Policy TM 2.1 – Promote Strategies and Technologies to Reduce Travel  
Demand ..... 18

    GOAL TM 3 – Coordinate Land Use and Transportation..... 19

        Policy TM 3.1 – Promote an Efficient Transportation System through  
Appropriate Land Use Patterns..... 19

NATURAL AND CULTURAL RESOURCES AND ENVIRONMENTAL QUALITY  
POLICIES..... 19

    GOAL NCR 1 – Conserve Natural Areas..... 19

        Policy NCR 1.1 – Conserve and Enhance Riparian Areas..... 19

        Policy NCR 1.2 – Conserve Wildlife Habitat and Corridors and Sensitive  
Development Areas ..... 21

        Policy NCR 1.3 – Preserve Significant Views and Ridgelines..... 25

    GOAL NCR 2 – Preserve Cultural Resources ..... 26

        Policy NCR 2.1 – Preserve Cultural Resources..... 26

    GOAL NCR 3 – Maintain High Standards for Water Quality ..... 26

        Policy NCR 3.1 – Improve the Quality of Water Discharged to Streams  
and Other Water Bodies in the Region ..... 26

    GOAL NCR 4 – Meet Environmental Standards for Air Quality ..... 27

        Policy NCR 4.1 – Improve Air Quality ..... 27

    GOAL NCR 6 – Reduce Energy Consumption in the County ..... 28

        Policy NCR 6.2 – Encourage the Development and Use of Alternative  
Energy Sources ..... 28

        Policy NCR 6.4 – Encourage and Support Energy Conservation  
Countywide ..... 28

    GOAL NCR 8 – Prevent Negative Impacts on Human Health and the  
Environment from Solid Waste Processing or Disposal Operations ..... 29

        Policy NCR 8.4 – Encourage the Minimization, Careful Collection and  
Proper Disposal of Hazardous Components, Products and Waste..... 29

RURAL AREA GOALS AND POLICIES ..... 29

    GOAL RA GM 1 – Preserve the Rural Character of the Rural Area ..... 29

        Policy RA GM 1.1 – Discourage Linear Development along I-70 and  
        Major Arterials Outside of Designated Growth Areas..... 29

    GOAL RA EH 1 – Maintain Agricultural Operations in Arapahoe County ..... 30

        Policy RA EH 1.1 – Restrict Development that is Not Directly Related to  
        or Dependent upon Agriculture ..... 30

        Policy RA EH 2.1 – Encourage Business Owners, Landowners, and  
        Ranchers to Develop Agritainment or Agri-tourism uses. .... 30

        Policy RA EH 2.2 – Continue to Support Resource-Based Recreation in  
        the Rural Area..... 30

    GOAL RA NCR 1 – Preserve Lands of Agricultural Importance ..... 30

        Policy RA NCR 1.1 – Conserve Prime Agricultural Lands ..... 30

TIER 3 GOALS AND POLICIES..... 31

    GOAL T3 GM 1 – Preserve the Rural, Agricultural Character of Tier 3 ..... 31

        Policy T3 GM 1.1 – Retain Agricultural Uses in Tier 3 ..... 31

REFERENCES..... 32

## LIST OF ACRONYMS AND ABBREVIATIONS

1041	Areas and Activities of State Interest Permit
Act	Powerline Trails Act
APEN	Air Pollutant Emissions Notice
APLIC	Avian Power Line Interaction Committee
Arapahoe County §1041 Regulations	Regulations Governing Areas and Activities of State Interest in Arapahoe County
BMP	Best Management Practice
CDPHE	Colorado Department of Public Health and Environment
Compass	Colorado Cultural Resource Online Database
CPW	Colorado Parks and Wildlife
CRS	Colorado Revised Statutes
EMF	Electric and Magnetic Fields
FEMA	Federal Emergency Management Agency
GESC	Grading, Erosion and Sediment Control
IPaC	USFWS Information for Planning and Consultation
IEEE	Institute of Electrical and Electronics Engineers
NESC	National Electrical Safety Code
NRHP	National Register of Historic Places
OAHP	Office of Archaeology & Historic Preservation
Pathway	Colorado's Power Pathway
ROW	Right-of-Way
SEMSWA	Southeast Metro Stormwater Authority
SWMP	Stormwater Management Plan
TCA	Temporary Construction Area
Tetra Tech	Tetra Tech Inc.
USFWS	U.S. Fish and Wildlife Service
Xcel Energy	Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy

## INTRODUCTION

The Colorado's Power Pathway (Pathway) transmission line in unincorporated Arapahoe County is located in the Map 1 Development Framework Map (West Half) of the Arapahoe County Comprehensive Plan (Arapahoe County 2022). According to this map, Pathway is located within the Lowry Range Sub-Area Plan and Rural Tier 3 Comprehensive Plan designations. A portion of the Pathway transmission line alignment north of East Quincy Avenue crosses the Urban Development Area, Conservation Area, and Future Development Area designations of the Lowry Range Sub-Area Plan (Arapahoe County 2007). The Pathway transmission line is located within portions of the Lowry Trust Properties, Lowry Superfund Site, and Denver Arapahoe Disposal Site as designated on the Arapahoe County Comprehensive Plan Urban Area Land Use Map (Arapahoe County 2022).

Pathway is located within unincorporated Arapahoe County in the following zone districts: A-1 (Agricultural-1), A-E (Agricultural Estate), I-2 (Heavy Industrial), I-2 PUD (Heavy Industrial Planned Unit Development), O (Open), F (Floodplain) (Arapahoe County 2022). The Beichle Laydown Yard will be located northwest of the intersection of East Quincy Avenue and County Road 129 in parcel number 2067-00-0-00-322 in the A-1 zone district (see the Vicinity Map [ASI25-001\_LE25-003-Vicinity Map]). Pathway consistency with the Arapahoe County Comprehensive Plan goals and policies is addressed in this document.

## GROWTH MANAGEMENT POLICIES

### GOAL GM 1 – ENSURE A COMPACT LAND DEVELOPMENT PATTERN

#### Policy GM 1.2 – Implement the Comprehensive Plan in a Manner that Respects the Rights of Property Owners and the Community

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy) understands and respects the operations of property owners, including long-established agricultural, farming, and ranching practices within Arapahoe County.

Pathway has been designed to mitigate against negative impacts to property owners with respect to use and enjoyment of their land including but not limited to agricultural practices. The transmission line alignment spans existing irrigation ditches and pivot irrigation in fields and follows section lines, road rights-of-way (ROWs), and property boundaries to minimize effects on existing uses and agricultural operations. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities

can continue to be used for agricultural operations after construction has been completed.

Pathway will respect agricultural practices regarding water resources and not result in adverse impacts on water resources related to agricultural practices. The transmission line will not generate pollutant loads. Pathway will not impact aquifers in the 150-foot transmission line ROW corridor subject to the 1041 Permit and Location and Extent Permit Applications.

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, remediation will resume pre-project conditions.

The transmission line will span or avoid any wetlands, streams, lakes, and reservoirs as possible. There are poles located in the Federal Emergency Management Agency (FEMA)-designated 100-year floodplain. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and Southeast Metro Stormwater Authority (SEMSWA), as applicable, to ensure compliance with each jurisdiction's regulations on this matter. Water quality will be maintained during construction through best management practices (BMPs) and the site-specific stormwater management plan (SWMP) as well as the grading, erosion and sediment control (GESOC) plan.

### **Policy GM 1.3 – Promote Environmental Justice**

Pathway has been sited to avoid residential areas. Pathway is sited within Agricultural and Industrial zone districts within Arapahoe County and is compatible with agricultural and industrial uses. Pathway is also sited in many areas to parallel existing linear facilities such as section lines, roadways, and other transmission line corridors to better concentrate similar land uses. Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76 percent) is co-located along existing electric transmission infrastructure and existing roads. The preferred route chosen has the highest percentage (63 percent) of co-location with existing linear infrastructure, including existing transmission lines, roads, rail and pipelines for its entire length and is less impactful to the landscape compared to other route alternatives. Xcel Energy understands that Pathway will require public hearings before the Planning Commission and Board of County Commissioners for the 1041 Permit and Location and Extent Permit Applications, and the public will be notified in accordance with the Regulations Governing Areas and Activities of State Interest in Arapahoe County (Arapahoe County §1041 Regulations, Arapahoe County 2006) and Section 5-2.2 of the Arapahoe County Land Development Code (Arapahoe County 2024).

## **GOAL GM 3 – REDUCE THE LOSS OF LIFE, HEALTH AND PROPERTY DUE TO RISKS POSED BY NATURAL AND HUMAN CAUSED HAZARDS**

### **Policy GM 3.1 – Direct Future Development to Areas with Low Risks from Natural and Human-caused Hazards**

Xcel Energy acknowledges this County policy to encourage and direct development to areas with low risks from natural- and human-caused hazards.

The proposed Pathway alignment through unincorporated Arapahoe County is generally located in areas with low risks from both natural- and human-caused hazards. However, due to the spatial nature of the project, the proposed route will require crossing multiple FEMA-mapped floodplain boundaries within the County's jurisdiction. Pathway will avoid regulated floodplains to the extent practicable. The transmission line will span floodplain areas with overhead conductors where feasible. There are poles located in the FEMA-designated 100-year floodplain. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter. As such, no impacts to floodplains are anticipated.

Additionally, transmission lines are built and maintained to meet or exceed safety standards, such as those specified by the National Electrical Safety Code (NESC) and the North American Electric Reliability Corporation. Every effort is made to ensure safety in construction, operation, and maintenance of transmission lines. Transmission lines are designed to withstand extreme weather conditions, and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The transmission poles will be equipped with shield wires above the energized line; this equipment adds to the pole height but also provides protection against lightning strikes.

Xcel Energy's transmission lines are monitored 24/7/365 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage. For the safety of the general public, unauthorized personnel are not permitted to come in contact with the transmission line conductor wire.

### **Policy GM 3.4 – Prepare for Recovery from Disasters**

Xcel Energy understands that Arapahoe County has established a Community Recovery Framework to recover from natural disasters.

Transmission lines are designed to withstand extreme weather conditions and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The transmission poles will be equipped with shield wires above the energized line; this equipment adds to the pole height but also provides protection against lightning strikes. In addition, fiber optic communication will also be installed that will allow for direct monitoring of the transmission line from Xcel Energy operating centers. If a defect or issue appears on the line, it will be detected immediately.

Xcel Energy's transmission lines are monitored 24/7/365 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage.

Xcel Energy's facilities are designed, constructed, operated and maintained to meet or exceed applicable requirements of the Institute of Electrical and Electronics Engineers (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 (CRS) 31-15-601, will be observed during construction and normal operation of the transmission line and substation.

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 by the breaker equipment 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 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 its Responding to Utility Emergencies Program.

### **Policy GM 3.5 – Protect Existing and New Development from Human-caused Hazards.**

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 CRS 31-15-601, will be observed during construction and normal operation of the transmission line and substation.

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 caused by remote actors (e.g. fire), 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.

## **PUBLIC FACILITIES AND SERVICES POLICIES**

### **GOAL PFS 6 – ENSURE THE ADEQUACY OF ELECTRIC, NATURAL GAS, TELEPHONE, CABLE AND INTERNET UTILITIES IN EXISTING AND NEW DEVELOPMENT**

#### **Policy PFS 6.1 – Continue Collaboration with Utility Companies in the Development Review Process**

Pathway will improve the state's electric grid and enable future renewable energy development by providing backbone transmission capacity. The Eastern Plains region of Colorado is one of the nation's best areas for wind and solar energy generation, but it does not currently have a network transmission system that can integrate these new generation resources into the state's interconnected grid system, which is needed to meet Colorado's clean energy goals. Pathway will allow developers of energy generation projects to interconnect energy resources located in the areas of the state that are underserved by backbone transmission lines and allow Xcel Energy to deliver energy to electric customers.

### **GOAL PFS 7 – ENSURE EXISTING AND NEW DEVELOPMENT HAVE ADEQUATE POLICE AND FIRE PROTECTION**

#### **Policy PFS 7.1 – Continue Collaboration with Service Providers to Ensure an Adequate Level of Service Is Provided to Existing and New Development**

Xcel Energy understands and agrees with this goal and policy to ensure adequate levels of service are provided to existing and new development. Because Pathway is a public utility project for which no additional land uses proposed, the main service

collaboration needed for the utility line is with the local fire departments and emergency responders. Xcel Energy 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 is coordinating with each Fire District crossed by Pathway in Arapahoe County, which include the Sable Altura Fire Protection District, Aurora Fire Rescue District, and the Bennett-Watkins Fire Rescue District. Xcel Energy has obtained the Letters of Service provided by the Sable Altura Fire Protection District, Aurora Fire Rescue District, and the Bennett-Watkins Fire Rescue District; the Letters of Service from each Fire District and the Fire District Coordination Letters are provided in Fire District Letters of Service (LE25-003-Will Serve-Fire).

## **GOAL PFS 8 – PROVIDE RAPID AND COMPREHENSIVE RESPONSE TO NATURAL DISASTERS**

### **Policy PFS 8.1 – Ensure an Effective Emergency Response Program**

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 CRS 31-15-601 will be observed during construction and normal operation of the transmission line and substation.

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.

## **GOAL PFS 12 – MINIMIZE IMPACTS OF LOCAL AND REGIONAL PUBLIC FACILITIES AND UTILITY FACILITIES**

### **Policy PFS 12.1 – Thoroughly Evaluate Development of Public Facilities**

For each Pathway segment, a detailed siting and routing analysis was completed to examine resources, constraints, opportunities, and additional routing considerations at a local level. Routing a new transmission line and siting a substation require a comprehensive review and analysis of factors and criteria including, but not limited to, electric system planning, engineering, environmental and cultural resources, land use, regulatory requirements, land rights, stakeholder input, and public and worker safety. The Addendum to Routing and Siting Study for Segment 5 is included as ASI25-001\_LE25-003-Routing and Siting Study.

Public outreach efforts were conducted to receive public and stakeholder feedback and input on route selection. In June 2021, Xcel Energy held three virtual project introduction meetings for the public to discuss Pathway's benefits to communities and the process Xcel Energy used to identify the locations of the proposed transmission lines and new substations. From June through August 2021, Xcel Energy met with jurisdictions within Pathway's Study Areas to discuss Pathway and receive feedback; Xcel Energy met with Arapahoe County representatives on July 29, 2021. From September through November 2021, Xcel Energy held virtual and in-person public meetings to share information about Pathway and receive feedback on the focus areas and preliminary transmission line links. A public open house was also held at the Arapahoe County Fairgrounds on November 3, 2021. From January through May 2022, Xcel Energy held in-person public meetings to present the preferred route and substation locations for Segments 1, 2, 3, 4, and the Extension and to provide siting and routing updates for Segment 5. In-person meetings were held at the Arapahoe County Fairgrounds on February 28 and May 2, 2022. On March 18, 2025, a neighborhood outreach meeting was held at the Arapahoe County Fairgrounds for the Arapahoe County 1041 and Location and Extent permit applications for Pathway. The neighborhood outreach meeting was conducted and noticed in accordance with Section 5-2.1.2 of the Arapahoe County Land Development Code (Arapahoe County 2024) and Part 7 of the Arapahoe County Development Application Manual (Arapahoe County 2019). A summary of the Arapahoe County neighborhood outreach meeting is provided in ASI25-001\_LE25-003-Neighborhood Mtg Summary.

Preferred transmission line routes and substation sites were selected after completion of routing and siting studies, coordination with permitting entities, and conducting public outreach. Xcel Energy has received approved land use permits to construct and operate Pathway in all of Segments 2 and 3 and portions of Segments 1, 4, and 5, including

approximately 392 miles of permitted transmission line in Morgan, Washington, Kit Carson, Cheyenne, Kiowa, Crowley, Weld, and Lincoln counties and the City of Aurora.

The Pathway facilities have been sited to minimize surface-use impacts to the surrounding community and preserve land for agriculture, rangelands, wetlands, and critical habitat areas. As such, Pathway is in alignment with this goal.

By working with individual landowners, co-locating 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. Pathway will not affect wetlands or critical habitats in Arapahoe County. 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. Xcel Energy has communicated with Colorado Parks and Wildlife (CPW) 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.

### **Policy PFS 12.2 – Consider Utility Needs to Support Growth and Development of the Region**

The Eastern Plains region of Colorado is one of the nation's best areas for wind and solar energy generation, but it does not currently have a network transmission system that can integrate these new generation resources into the state's interconnected grid system, which is needed to meet Colorado's clean energy goals. Pathway will support Xcel Energy's Clean Energy Plan (Xcel Energy 2021) that is estimated to deliver as much as an 85 percent reduction in carbon dioxide emissions by 2030 and add approximately 5,000 megawatts of new wind, solar, and other resources. Pathway will help to meet the state's growing electricity needs, improve safety, reliability, and affordability, and enable the transition to clean energy. Pathway will allow developers of energy generation projects to interconnect energy resources located in the areas of the state that are underserved by backbone transmission lines and allow Xcel Energy to deliver energy to electric customers.

Routing a new transmission line and siting a substation require a comprehensive review and analysis of factors and criteria including, but not limited to, electric system planning, engineering, environmental and cultural resources, land use, regulatory requirements, land rights, stakeholder input, and public and worker safety. Routing and siting studies were prepared to review and consider reasonable routing and siting alternatives for the new major electrical facilities (pursuant to CRS 29-20-108(4)(a) and (b)). The process is described in detail in the routing and siting studies for each segment of Pathway. The

Addendum to Routing and Siting Study for Segment 5 is provided as ASI25-001\_LE25-003-Routing and Siting Study.

Xcel Energy has prepared a 1041 Permit Application and a Location and Extent Permit Application for proposed Pathway facilities in Arapahoe County. Pathway will be reviewed by Arapahoe County for compliance with the Arapahoe County §1041 Regulations and Location and Extent regulations.

### **Policy PFS 12.3 – Require Land Use Compatibility when Siting Local and Regional Utility Facilities**

Pathway is sited within Agricultural and Industrial zone districts within Arapahoe County and is compatible with agricultural and industrial use.

By working with individual landowners, co-locating the transmission line route, or strategically routing adjacent to other existing public infrastructure improvements, the Pathway alignment has minimized the impacts to adjacent agricultural, rangeland and industrial uses. Pathway will not affect wetlands or critical habitats in Arapahoe County. 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. Xcel Energy has communicated with representatives from CPW and USFWS regarding Pathway and will continue to coordinate with them throughout design and construction of Pathway and comply with all applicable regulatory requirements.

Upon completion, Pathway will be operated and monitored remotely 24/7/365 to provide safe and reliable electric service. On average, the substation will be visited one to two times per month for inspections and maintenance.

Where feasible, the Pathway route through Arapahoe County is co-located along existing infrastructure to minimize impacts to the surrounding area. Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76 percent) is co-located along existing electric transmission infrastructure and existing roads.

### **GOAL PFS 13 – DIVERT A LARGER PORTION OF WASTE FROM LANDFILLS**

#### **Policy PFS 13.1 – Implement Measures to Reduce Waste in Landfills**

Xcel Energy appreciates Arapahoe County's efforts to reduce waste in landfills. Waste will not be generated on an ongoing basis. Waste generated during construction

activities will be properly disposed of. Recyclable and scrapable waste materials, including steel and aluminum, will be collected separately for recycling, where feasible.

## **NEIGHBORHOOD LIVABILITY POLICIES**

### **GOAL NL 1 – CREATE LIVABLE MIXED-USE NEIGHBORHOODS IN DESIGNATED GROWTH AREAS**

#### **Policy NL 1.5 – Encourage New Development and Redevelopment to Incorporate Environmentally Sustainable Development Techniques and Energy Conservation Measures**

The Eastern Plains region of Colorado is one of the nation's best areas for wind and solar energy generation, but it does not currently have a network transmission system that can integrate these new generation resources into the state's interconnected grid system, which is needed to meet the Colorado legislature's statutory clean energy targets. Pathway will support Xcel Energy's Clean Energy Plan (Xcel Energy 2021) that is estimated to deliver as much as an 85 percent reduction in carbon dioxide emissions by 2030 and add approximately 6,500 megawatts of new wind, solar, and other resources. Pathway is a critical component to Xcel Energy's efforts to meet the state's statutorily required clean energy targets as well as Colorado's growing electricity needs. Pathway will also improve safety, reliability, and energy affordability.

### **GOAL NL 2 – ENSURE COMPATIBILITY BETWEEN NEW DEVELOPMENT AND EXISTING NEIGHBORHOODS**

#### **Policy NL 2.1 – Require New Development to be Compatible with Existing Residential Neighborhoods**

Avoidance of residential neighborhoods, subdivisions and planned developments were major factors in identifying the preferred and alternative routes (see Addendum to Routing and Siting Study for Segment 5 [ASI25-001\_LE25-003-Routing and Siting Study]). Residential areas are concentrated in specific sections of Arapahoe County and are more widespread within the more rural parts of unincorporated Arapahoe County where Pathway is sited. Existing residences are shown on Vicinity Map (ASI25-001\_LE25-003-Vicinity Map).

## **GOAL NL 3 – ENSURE NEW DEVELOPMENT AND REDEVELOPMENT PROVIDES OPPORTUNITIES FOR HEALTHY LIVING**

### **Policy NL 3.1 – Encourage Development That Supports Healthy Communities**

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. Pathway will not affect wetlands or critical habitats in Arapahoe County. Sensitive natural resource areas, including wetlands and critical habitats for wildlife, were specifically considered as part of the routing and siting analysis when the preferred location for the transmission line was identified to minimize potential interference from Pathway facilities (see Addendum to Routing and Siting Study for Segment 5 [ASI25-001\_LE25-003-Routing and Siting Study]). Xcel Energy has communicated with CPW and USFWS representatives regarding Pathway and will continue to coordinate with them throughout design and construction of Pathway and comply with applicable regulatory requirements.

Pathway will also support healthy communities by enhancing the socioeconomic environment in Arapahoe County during the construction period via increased revenue to local businesses and social services. Construction will require contract labor and provide local jurisdictions and host communities with additional tax revenues and potential employment opportunities. Once in operation, Pathway may facilitate ongoing job opportunities and employment associated with clean energy projects (wind, solar, etc.) that may be approved by Arapahoe County or its surrounding jurisdictions that will ultimately interconnect to Pathway.

### **Policy NL 3.6 – Undertake Measures to Increase Public Safety**

Transmission lines are built and maintained to meet or exceed safety standards, such as those specified by the NESC and the North American Electric Reliability Corporation. Every effort is made to ensure safety in construction, operation, and maintenance of transmission lines. Transmission lines are designed to withstand extreme weather conditions and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The transmission poles will be equipped with shield wires above the energized line; this equipment adds to the pole height but also provides protection against lightning strikes.

Xcel Energy's transmission lines are monitored 24/7/365 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage. For the safety of the general public, unauthorized personnel are not permitted to come in contact with the transmission line conductor wire.

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.

### **Policy NL 3.7 – Minimize Impacts to Property from Human-caused Hazards**

Noise and Electric and Magnetic Fields (EMF) studies were conducted for Pathway and submitted as part of Pathway's Certificate of Public Convenience and Necessity application (Noise and EMF Study [ASI25-001-Noise and EMF Study]). The study concluded that magnetic field levels at the edge of the Pathway transmission line ROW are projected to be 54.7 milligauss. These levels are below the 150 milligauss level deemed reasonable by CPUC Rule 3206(e) at 25%, 50% and 100% of the conductor current carrying capacity and were deemed reasonable by the Colorado Public Utilities Commission. Because the projected EMF levels are deemed reasonable by the CPUC, they do not need to be mitigated to a lower level. Pathway facilities will be designed, constructed, operated, and maintained to meet or exceed applicable standards of design and performance set forth in the NESG.

Chemicals that may be used during construction and operation are those found in diesel fuel, gasoline, coolant (ethylene glycol), and lubricants in machinery. No hazardous materials will be permanently used, stored, or generated on site of Pathway facilities. Hazardous materials used during construction and operation in Arapahoe County may include: 6,500 cubic yards of concrete, unleaded fuel, diesel fuel, and hydraulic fluid and will be stored within the TCAs pursuant to appropriate storage protocols and applicable regulatory controls. Hazardous materials will not be drained onto the ground or into streams or drainage areas. Hazardous materials used during construction and operation will be used and disposed of in compliance with all applicable federal, state, and local regulations. Enclosed containment will be provided for trash disposal. Construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed and taken to a disposal facility authorized to accept such materials. 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.

Short-term, temporary increases in fugitive dust and construction equipment exhaust (fumes) are anticipated during construction activities. These are not expected to cause a public nuisance. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities. As a result, increased dust or exhaust are not expected during operations.

Xcel Energy will apply for a Colorado Department of Public Health and Environment (CDPHE) Air Pollutant Emissions Notice (APEN) for land development prior to construction and follow state standards to control the release of fugitive dust related to construction, if necessary. The APEN will be required for a land disturbance greater than 25 contiguous acres and land development activities with a duration longer than 6 months.

Pathway will not cause hazardous conditions, potential air or water pollutants, or other noxious influences.

## **GOAL NL 5 – DEVELOP A COUNTYWIDE OPEN SPACE, PARKS AND TRAILS SYSTEM**

### **Policy NL 5.1 – Implement Actions to Create a Countywide System of Connected Open Space, Public Parks and Trails**

Xcel Energy appreciates Arapahoe County's efforts to create a network of open space, parks, and trails. The Powerline Trails Act (Act) was passed in 2022 to help raise awareness and create opportunities for Public Entities defined as "the state, a local government, or a district" to co-locate public recreation trails within transmission corridors. Xcel Energy has notified Arapahoe County of the potential for construction of a Powerline Trail within the Pathway transmission corridor. Xcel Energy is not in the business of building, owning, or maintaining public recreation trails and its land rights typically do not give it the right to do so. Nor does the Act require Transmission Providers to allow a Powerline Trail or any other facility on any of its transmission corridors. Xcel Energy's role under the Act is limited to facilitating the potential co-location of such trails by providing guidance to Public Entities on things such as what

safety clearances need to be maintained, which materials should be used in the construction of the trail, and where such trails can safely be co-located with Xcel Energy's facilities. Powerline Trails will ultimately be constructed by Public Entities after consulting with Xcel Energy, the CPW, and landowners about the safety and feasibility of such trails after the transmission corridor is constructed.

## **ECONOMIC HEALTH POLICIES**

### **GOAL EH 1 – EXPAND THE COUNTY'S EXISTING ECONOMIC BASE**

#### **Policy EH 1.1 – Retain and Promote Existing Industrial Lands in Designated Growth Areas**

A portion of Pathway is located in industrial zoned areas. The transmission line route through these areas will be adjacent to the East Quincy Avenue ROW and will not restrict current or future industrial development.

#### **Policy EH 1.2 – Encourage Environmentally Friendly Businesses and Jobs in Arapahoe County**

Pathway will add a network transmission system that can integrate environmentally friendly wind and solar generation sources in the Eastern Plains region of Colorado where they are most efficient to where the energy demand is the highest. By linking the best areas for generating wind and solar energy with where demand is, Pathway will improve the state's electric grid and enable future renewable energy development in the Eastern Plains region of Colorado. Pathway will increase electric service safety and reliability, boost the regional economy, and create jobs during construction. As such, Pathway will not only encourage but will be a catalyst for environmentally friendly businesses and jobs locating in Arapahoe County.

#### **Policy EH 1.3 – Encourage Community-based Economic Development and Revitalization**

Pathway will deliver economic benefits to rural communities across eastern and southern Colorado, including Arapahoe County, over the short and long-term. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Xcel Energy anticipates that the maximum number of construction workers on site for the substation and transmission line on any one day will be approximately 95 total<sup>1</sup>. Construction crews may reside in the area during construction. Revenue may increase for local businesses such as restaurants, gas stations, grocery stores, hotels, and other local

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<sup>1</sup> Personnel may not be located or concentrated at same work area on the same day.

businesses. Existing businesses and social services are adequate to support Pathway given the size of the construction crew and temporary nature of the construction activities. No impacts to emergency health care facilities or law enforcement services are therefore anticipated.

Once Pathway has been constructed, it may facilitate ongoing job opportunities and employment associated with clean energy projects (wind, solar, etc.) that may be approved by Arapahoe County or its surrounding jurisdictions that will ultimately interconnect to Pathway.

New electric power generated in the Eastern Plains will be delivered to the Harvest Mile Substation in Arapahoe County where it can be distributed throughout the system in Arapahoe County to meet future electric demand needs for business, redevelopment, and new projects.

Pathway is designed to enhance Colorado's electric transmission infrastructure, providing significant benefits to all Colorado residents, including those in Arapahoe County. Xcel Energy currently owns and operates several high voltage electric transmission lines within Arapahoe County and provides transmission service to other utilities, including those that directly serve Arapahoe County homes and businesses. Xcel Energy directly serves over 278,000 customers in Arapahoe County (Xcel Energy 2024); Pathway will connect directly to the existing 230-kV Harvest Mile Substation that serves Arapahoe County. The interconnected nature of the state's electric grid ensures that improvements in transmission capacity and reliability have widespread positive impacts to the state as a whole. Therefore, while Arapahoe County residents may receive electricity from different local providers that connect to the state's electric grid, Pathway's enhancements to the state's transmission infrastructure offer benefits through improved grid reliability, access to new generation resources, economic opportunities, and support for statewide environmental objectives and requirements.

**1. Enhanced Grid Reliability and Resilience:**

- Pathway will strengthen Colorado's electric grid, reducing the likelihood of outages and improving the system's ability to handle peak demands. This enhancement benefits all users connected to the grid, regardless of their specific local service provider.

**2. Open Access Transmission:**

- Colorado operates an open transmission system, allowing various utilities and cooperatives to utilize the transmission infrastructure. This open access ensures that the benefits of enhanced transmission capacity are shared across multiple service providers, benefiting Arapahoe County residents through improved grid performance.
- Pathway will provide bulk electric transmission capacity in eastern Colorado and will not change local electric service providers. Pathway will

create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals and requirements. 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 Arapahoe 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.

### 3. **Economic Development and Job Creation:**

- The construction and maintenance phases of Pathway are projected to create jobs and stimulate economic activity in Arapahoe County. This influx can lead to increased demand for local services and generate additional tax revenues, which can be reinvested into community projects and services, contributing to community development and prosperity.

### 4. **Compliance with State Energy Policies:**

- Pathway aligns with Colorado's legislative mandates aimed at reducing carbon emissions and promoting renewable energy adoption. By supporting these policies, Pathway contributes to environmental sustainability efforts that benefit all residents of the state.

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 Pathway. 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.

## **GOAL EH 4 – ACHIEVE FISCAL SUSTAINABILITY**

### **Policy EH 4.1 – Consider New Revenue Sources to Help Balance Revenues with Ongoing Infrastructure and Maintenance Costs**

Pathway is a utility project located in an area of sparse development; therefore, it is unlikely that this utility project is unlikely to be located in an area with maintenance requirements for existing County infrastructure.

### **Policy EH 4.3 – Ensure a Balanced Mix of Land Uses**

Pathway is sited in agricultural and industrial use areas and is compatible with these land uses. Pathway will not impact current or future land uses.

## **GOAL EH 5 – DEVELOP THE TOURISM INDUSTRY IN ARAPAHOE COUNTY**

### **Policy EH 5.1 – Support the Designation of Cultural Resource Landmarks or Districts on Local, State or National Registers**

Desktop cultural resources reviews were completed in December 2022 and again in April 2025. Cultural resource records were reviewed using archaeological site files and the Colorado Cultural Resource Online Database (Compass) maintained by the Colorado Historic Society Office of Archaeology & Historic Preservation (OAH). Included in the Compass database are records of properties listed in the National Register of Historic Places (NRHP). The cultural resources site file search was conducted for a 150-foot buffer of the transmission line ROW within Arapahoe County (the Research Area).

Within the Research Area are four (4) previously recorded cultural resources. These include a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp, fence, and transmission have been determined Not Eligible for listing in the NRHP by the OAH, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAH).

Higher voltage transmission lines are generally installed crossing over lower voltage lines to avoid potential interference. Pathway will cross the historic transmission line. Note that the exact location of the historic transmission line cannot be provided within public documents in accordance with the required confidentiality agreement with the State Historic Preservation Office. If needed, the Pathway transmission poles on either side of the historic transmission line will be designed to be taller to increase the clearance. Pathway will span site 5AH.1642. Site 5AH.73 will be re-surveyed and an official determination of eligibility will be obtained before construction of this project phase and the site will not be impacted. No transmission line poles will be constructed within site boundaries and the sites will not be impacted.

## **TRANSPORTATION AND MOBILITY POLICIES**

### **GOAL TM 1 – PROMOTE AN EFFICIENT AND BALANCED TRANSPORTATION SYSTEM**

#### **Policy TM 1.2 – Establish Long-Term Road Maintenance and Transportation System Improvement Priorities**

Pathway will not require multimodal transportation system improvements. Xcel Energy has worked with the Parks, Recreation & Open Space (PROS) division to ensure that structures will not be located in areas intended for future trail systems within the City of Aurora.

#### **Policy TM 1.3 – Require Connectivity and Continuity in Local and Regional Roads to Minimize Unnecessary Driving and Increase Safety**

Pathway will not require construction of new public roads. Pathway has been sited to preserve section line roadway alignments for future widening and install poles outside of the future road ROW and will obtain easements located outside of existing road ROW. The expansion of Quincy Avenue will incorporate sidewalks at full build out, Pathway will not obstruct this. In addition, Pathway will utilize its right-of-way for future trail expansions planned in the area. Pathway has been designed to locate future poles outside of areas designated by PROS for future trail systems.

### **GOAL TM 2 – PROMOTE ALTERNATIVE TRANSPORTATION SOLUTIONS**

#### **Policy TM 2.1 – Promote Strategies and Technologies to Reduce Travel Demand**

During construction, temporary traffic impacts are expected to be minor. The impact on local roads will vary daily as construction teams move along the route. Permitting serves to mitigate potential impacts on local County roads. The permitting process includes the development of traffic control plans and necessary tracking control and remediation plans. The resulting conditions of approval will be followed through the Pathway construction. Following construction, no traffic impacts are anticipated.

Xcel Energy's construction contractor will prepare Traffic Control Plans for E Quincy Avenue and will coordinate with Arapahoe County regarding lane and road closures. Construction materials will not be loaded or offloaded along E Quincy Avenue. Vendors will be prohibited from parking on public roadways around the construction of staging areas. Traffic Control Plans have been submitted to Arapahoe County with the

Temporary Use Permit Application (record number ZTU-2025-00004) for the Beichle Laydown Yard.

### **GOAL TM 3 – COORDINATE LAND USE AND TRANSPORTATION**

#### **Policy TM 3.1 – Promote an Efficient Transportation System through Appropriate Land Use Patterns**

Pathway is compatible with agricultural and industrial land uses. Pathway is sited adjacent to existing roads as practical. Pathway has been sited to preserve section line roadway alignments for future widening and install poles outside of the future road ROW and will obtain easements located outside of the existing road ROW. Pathway will not impact the transportation system. Pathway will not be located in areas that will obstruct the development of future planned road arterials in the region.

### **NATURAL AND CULTURAL RESOURCES AND ENVIRONMENTAL QUALITY POLICIES**

#### **GOAL NCR 1 – CONSERVE NATURAL AREAS**

##### **Policy NCR 1.1 – Conserve and Enhance Riparian Areas**

Federal, state, and local agencies designate areas to help conserve habitats critical to migratory birds and other sensitive species (e.g., National Wildlife Refuges, National Grasslands, state parks, and state wildlife areas). The Jurisdiction Resource Maps in the Addendum to Routing and Siting Study for Segment 5 (ASI25-001\_LE25-003-Routing and Siting Study) illustrate land jurisdiction for Pathway in Arapahoe County. No federally or state-managed conservation areas are within 1 mile of proposed Pathway facilities in Arapahoe County. In addition, no Critical Habitat designated by the USFWS is mapped in the same area (USFWS 2025c).

Beyond these priority habitats, Pathway will avoid or minimize impacts to habitat generally as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and temporary construction areas (TCAs). The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas at a crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC plan.

The Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report is provided as ASI25-001-Survey Report. As described in ASI25-001-Survey Report Tetra Tech Inc. (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). 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 in Figure 2, Arapahoe County Sheet Maps, of ASI25-001-Survey Report.

Pathway intends to avoid impacts to wetlands and WOTUS features to the extent practicable. All aquatic features and streams intersecting Pathway's ROW in Arapahoe County have been evaluated through desktop aerial evaluations and subsequent field verification.

No federally jurisdictional wetlands or waters will be impacted by the Project, and 404 Clean Water Act permits will not be required by the USACE. The span between transmission line poles can be up to 1,400 feet, and thus can be sited to avoid pole placement within and to span across wetlands and other WOTUS features to avoid permanent impacts. Based on the lengths provided in Table 9 in Section 2.12.c.1 of the 1041 Application Narrative (ASI25-001\_Narrative\_Approval Criteria), it is not anticipated that Pathway will result in any permanent impacts to wetlands or other WOTUS features in Arapahoe County. Associated access roads, laydown yards and other appurtenant features of Pathway will also be sited to avoid permanent impacts to wetlands and WOTUS features. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA. Other appurtenant features of Pathway will also be sited to avoid permanent impacts to wetlands and WOTUS features. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA.

Temporary impacts to wetlands and WOTUS during construction of Pathway will be avoided. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. 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. Section 3.5 of ASI25-001-Survey Report provides 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. The field-verified wetlands within the transmission line easement are shown in the revised Location and Extent Plan Set (LE25-003-Plan Set).

Pathway will not generate pollutant loads. 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. No alteration in the pattern or intensity of surface drainage as a result of construction or operation of the transmission line will occur.

Xcel Energy will comply with permit application requirements, County standards, and construction protocol to ensure that Pathway does not violate water quality standards. Prior to construction, a GESC Permit will be obtained from Arapahoe County for the transmission line and a Storm Water Permit for Construction Activities will be obtained from CDPHE.

### **Policy NCR 1.2 – Conserve Wildlife Habitat and Corridors and Sensitive Development Areas**

A desktop analysis of the portion of Pathway transmission lines 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 buffer was used to evaluate biological resources that could be influenced by Pathway construction, maintenance, 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 2023)
- National Land Cover Database (NLCD 2019)
- 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 2022)
- CPW Species Activity Mapping Data (CPW 2025a)
- CPW State Species List (CPW 2025b)
- Online species profiles and distribution information (CPW 2025c)

In addition to publicly available information, windshield and ground-based surveys of the proposed Pathway facility locations were 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. Ground-based raptor nest surveys and aerial raptor nest surveys were initially 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 in Arapahoe County. 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 construction activities of that phase of construction. 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 Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report is provided as ASI25-001-Survey Report. The field-verified raptor nests and suitable burrowing owl habitat identified within and adjacent to the transmission line ROW are shown in Figure 2, Arapahoe County Sheet Maps, of ASI25-001-Survey Report.

Figure 1 of ASI25-001-Survey Report shows the CPW-designated habitat within Arapahoe County. As shown in Figure 1 of ASI25-001-Survey Report, 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).

Potential impacts to wildlife species would primarily be associated with temporary disturbance from construction activities within the Pathway ROW, namely the removal and management of vegetation. In addition, increased noise and equipment movement during construction may temporarily displace mobile wildlife species from the immediate workspace area. These impacts are considered short-term in duration and normal wildlife movements would be expected to resume after construction has been

completed and disturbed areas have been restored in a manner generally similar to preconstruction conditions.

Pathway will avoid or minimize impacts to habitat generally as practicable. 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, as described in ASI25-001\_Noxious Weed Control Measures. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GES Plan.

To avoid or minimize impacts to wildlife, Pathway will implement measures such as requiring proper trash and food debris disposal and compliance with posted speed limits. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable.

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.

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.

Pathway has been sited to avoid known eagle nest and roost locations to the extent practicable. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable. 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.

Vegetation clearing during migratory bird breeding season (generally April 15 through September 1) could impact active nests by disturbing or destroying them, resulting in fatalities of adults, eggs, and/or young. 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. Surveys for nesting raptors, burrowing owls, and other ground nesting birds will be conducted in areas with suitable nesting habitat prior to construction activities. Additionally, lighting, construction noise, and vibration in the immediate vicinity of active nests, could potentially result in nest failure or abandonment. To avoid these potential impacts, Pathway has been sited to avoid known eagle nest and roost locations to the extent practicable. Operation of Pathway could result in direct impacts to raptor species through electrocution and/or collision. 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). To reduce the risk of electrocution and collision, electrical components of the transmission lines and Harvest Mile Substation equipment additions will be separated to minimize the risk of avian contact and will follow APLIC guidelines (APLIC 2006). Bird flight diverters or other marking devices may be used as determined necessary for specific locations.

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 siting and routing of Pathway. Xcel Energy met with CPW on June 10, 2025, to discuss CPW referral agency comments to several of the Pathway Segment 5 permit applications that are ongoing, including CPW's comments to the Arapahoe County 1041 Application. CPW was provided a summary of the meeting notes and concurred with them. CPW has confirmed the approach Xcel Energy is taking related to biological issues for Pathway. Pathway will continue to coordinate with CPW and USFWS through

permitting, construction, maintenance, and operation of Pathway as needed to ensure compliance with applicable federal and state regulations.

### **Policy NCR 1.3 – Preserve Significant Views and Ridgelines**

The existing visual landscape in the area around the proposed Pathway transmission line route consists of mainly agricultural land uses including pivot irrigated crops and pastureland. Trees are sparse and herbaceous land cover dominates the area. Industrial facilities present near Pathway facilities include solar farms, high-voltage electric transmission lines, and industrial development. Electric distribution lines are visible throughout the area and are generally located along roads to serve residential and commercial areas. There are several existing high voltage transmission lines and electrical substations in Arapahoe County (HIFLD 2022). Other linear infrastructure, including local roads exist in proximity to Pathway. Where feasible, the Pathway route through Arapahoe County is co-located along this existing infrastructure to minimize impacts to the surrounding area. The transmission line will be visible to viewers with direct, open views. Viewers located farther away are likely to experience less visual impact because the existing screening (topography, vegetation, buildings) and distance from the facilities will decrease potential views.

The Pathway route through Arapahoe County is co-located along existing transmission infrastructure for approximately 13 miles and along East Quincy Avenue to reduce visual impacts. The type of steel used will be weathering steel that oxidizes to resemble a natural brown look and is not shiny. 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 poles in the viewshed. Representative photographic simulations are included in Plans, Representative Photographs, and Simulations (ASI25-001\_LE25-003-Photosim).

Pathway is not anticipated to result in visual impacts to recreational users of Aurora Reservoir. The Aurora Reservoir is greater than one mile south of East Quincy Avenue, and three existing high voltage transmission lines, two photovoltaic solar facilities, and a wastewater treatment plant are between the Aurora Reservoir and the Pathway transmission line.

Existing undisturbed trees, shrubs, and native vegetation will be preserved to the extent possible to maintain visual contrast in the landscape. Following construction, the Pathway ROW will be restored in a manner generally similar to pre-construction conditions.

## **GOAL NCR 2 – PRESERVE CULTURAL RESOURCES**

### **Policy NCR 2.1 – Preserve Cultural Resources**

Desktop cultural resources reviews were completed in December 2022 and again in April 2025. Cultural resource records were reviewed using archaeological site files and the Compass maintained by the Colorado Historic Society OAHp. Included in the Compass database are records of properties listed in the NRHP. The cultural resources site file search was conducted for a 150-foot buffer of the transmission line ROW within Arapahoe County (the Research Area).

Within the Research Area are four (4) previously recorded cultural resources. These include: a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp, fence, and transmission have been determined Not Eligible for listing in the NRHP by the OAHp, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAHp).

Higher voltage transmission lines are generally installed crossing over lower voltage lines to avoid potential interference. Pathway will cross the historic transmission line. Note that the exact location of the historic transmission line cannot be provided within public documents in accordance with the required confidentiality agreement with the State Historic Preservation Office. If needed, the Pathway transmission poles on either side of the historic transmission line will be designed to be taller to increase the clearance. Pathway will span site 5AH.1642. Site 5AH.73 will be re-surveyed and an official determination of eligibility will be obtained before construction of this project phase and the site will not be impacted. No transmission line poles will be constructed within site boundaries and the sites will not be impacted. No permits need to be obtained from the State Historic Preservation Office.

## **GOAL NCR 3 – MAINTAIN HIGH STANDARDS FOR WATER QUALITY**

### **Policy NCR 3.1 – Improve the Quality of Water Discharged to Streams and Other Water Bodies in the Region**

Surface flow varies across the project route due to the nature of a linear build. The direction of flow will not change due to construction, even in areas where minor localized grading is expected.

Surface water flow from Pathway will not change due to the minor localized grading impacts and pole installation.

Impacts to water quality will be minimized during construction through BMPs and the site-specific SWMP. Pathway will not impact the quantity or quality of water flowing off of the site. The transmission line will span streams and waterways that cross the corridor and impacts to jurisdictional waters will be avoided. Xcel Energy will comply with permit application requirements, County Standards, and construction protocol to ensure that Pathway does not violate water quality standards. Prior to construction, a GESG Permit will be obtained from Arapahoe County and a Storm Water Permit for Construction Activities will be obtained from CDPHE.

## **GOAL NCR 4 – MEET ENVIRONMENTAL STANDARDS FOR AIR QUALITY**

### **Policy NCR 4.1 – Improve Air Quality**

Arapahoe County is in attainment with National Ambient Air Quality Standards for the following criteria pollutants: particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide, and lead; Arapahoe County is in non-attainment for ozone (EPA 2025), therefore, this geographic area has air quality that fails to meet the National Ambient Air Quality Standards for ground-level ozone.

Short-term effects are anticipated from a temporary increase in construction vehicles, which may increase fumes and fugitive dust, construction equipment exhaust (fumes), and clearing and preparing areas for construction (dust). The short-term effects are not expected to cause a public nuisance. If a nuisance arises during construction, the nuisance will be mitigated in coordination with Arapahoe County.

It is anticipated that an average of 30 trucks per day will be utilized during construction of the transmission line for crews, spotting materials, framing poles, and erecting poles. Concrete truck deliveries will be made daily when the foundations and piers are being constructed. Multiple deliveries of yard rock (up to 48 per day) and cement (up to 28 per day) will be required daily at certain stages of construction. Materials will be delivered to the laydown yard at the onset of construction. An additional 10 to 15 trucks will be needed to deliver steel poles, conductor, anchor bolts, and foundation materials daily to work areas. The impact to local roads will vary day by day as the construction moves along the Pathway transmission line route.

Water trucks will be utilized during construction activities around roadway access points to suppress dust from vehicles and equipment as necessary within the Pathway ROW and county roads as per coordination with Arapahoe County. Xcel Energy will apply for a CDPHE APEN for land development prior to construction and follow state standards to control the release of fugitive dust related to construction if necessary. The APEN will

be required for a land disturbance greater than 25 contiguous acres and land development activities with a duration longer than 6 months.

During operation, Pathway will not generate trips in excess of those currently experienced as the transmission line facilities represent a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities and increased fumes, exhaust, and dust during operations are not expected.

## **GOAL NCR 6 – REDUCE ENERGY CONSUMPTION IN THE COUNTY**

### **Policy NCR 6.2 – Encourage the Development and Use of Alternative Energy Sources**

Pathway will add a network transmission system that can integrate wind and solar generation sources in the Eastern Plains region of Colorado where they are most efficient to where the energy demand is the highest. By linking the best areas for generating wind and solar energy with where demand is, Pathway will improve the state's electric grid and enable future renewable energy development in the Eastern Plains region of Colorado. Pathway will increase electric service safety and reliability, boost the regional economy, and create jobs during construction. The 1041 Permit and Location and Extent Permit Applications describe a portion of Pathway in Arapahoe County; the overall system includes approximately 550 miles of transmission line and new and expanded substations that will encourage development of these Alternative Energy Sources.

Pathway does not connect to a specific power source. Facilities in Arapahoe County are part of the larger Pathway that creates a transmission "loop" to provide additional transmission capacity. Pathway is being routed through some of the best wind and solar resource zones in Colorado. New renewable energy generation is anticipated to be developed in these zones. The location of these new generation resources is currently unknown until Xcel Energy's Electric Resource Plan process has been completed. Generally, however, new generation resources are expected to interconnect at substations located at segment endpoints.

### **Policy NCR 6.4 – Encourage and Support Energy Conservation Countywide**

See the response to Policy NCR 6.2.

## **GOAL NCR 8 – PREVENT NEGATIVE IMPACTS ON HUMAN HEALTH AND THE ENVIRONMENT FROM SOLID WASTE PROCESSING OR DISPOSAL OPERATIONS**

### **Policy NCR 8.4 – Encourage the Minimization, Careful Collection and Proper Disposal of Hazardous Components, Products and Waste**

No hazardous materials will be used, stored, or generated on site of Pathway facilities. Chemicals that may be used during construction and operation are those found in diesel fuel, gasoline, coolant (ethylene glycol), and lubricants in machinery. Hazardous materials used during construction and operation in Arapahoe County may include: 6,500 cubic yards of concrete, unleaded fuel, diesel fuel, and hydraulic fluid and will be stored within the TCAs pursuant to appropriate storage protocols and applicable regulatory controls.

Hazardous materials used during construction and operation will be used and disposed of in compliance with all applicable federal, state, and local regulations. Enclosed containment will be provided for trash disposal. Construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed and taken to a disposal facility authorized to accept such materials. No hazardous materials will be 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. All activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

## **RURAL AREA GOALS AND POLICIES**

### **GOAL RA GM 1 – PRESERVE THE RURAL CHARACTER OF THE RURAL AREA**

#### **Policy RA GM 1.1 – Discourage Linear Development along I-70 and Major Arterials Outside of Designated Growth Areas**

Where feasible, the Pathway route through Arapahoe County is co-located along existing infrastructure to minimize impacts to the surrounding area. Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76

percent) is co-located along existing electric transmission infrastructure and existing roads. Two existing high voltage transmission lines are located on the south side of East Quincy Avenue as shown in Vicinity Map (ASI25-001\_LE25-003-Vicinity Map).

## **GOAL RA EH 1 – MAINTAIN AGRICULTURAL OPERATIONS IN ARAPAHOE COUNTY**

### **Policy RA EH 1.1 – Restrict Development that is Not Directly Related to or Dependent upon Agriculture**

The transmission line alignment spans existing irrigation ditches and pivot irrigation in fields and follows section lines, road ROWs, and property boundaries to minimize effects on existing uses and agricultural operations. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed. See also the response to Policy GM 1.2.

### **Policy RA EH 2.1 – Encourage Business Owners, Landowners, and Ranchers to Develop Agritainment or Agri-tourism uses.**

Pathway is compatible with the existing agricultural and industrial land uses that surround the proposed transmission line routing through Arapahoe County. As such, Pathway will not affect any current or future agritainment or agri-tourism uses in Arapahoe County.

### **Policy RA EH 2.2 – Continue to Support Resource-Based Recreation in the Rural Area**

The Arapahoe County Fairgrounds and Regional Park is located south of East Quincy Avenue, on the opposite side of East Quincy Avenue as are the Pathway facilities proposed in Arapahoe County. No impacts to recreation areas are anticipated. See also the response to Policy NL 5.1.

## **GOAL RA NCR 1 – PRESERVE LANDS OF AGRICULTURAL IMPORTANCE**

### **Policy RA NCR 1.1 – Conserve Prime Agricultural Lands**

Construction and operation of Pathway will not inhibit agricultural production or operations. Pathway will result in minimal permanent impacts to agricultural lands. Through private agreements with individual landowners, the proposed alignment spans existing irrigation ditches and pivot irrigation in fields. It is designed adjacent to and

parallel with section lines, parcel boundaries, and public ROW to limit impacts from the development on overall agricultural operation and production in the area.

During construction, temporary impacts to agricultural activities are expected to be minor. Xcel Energy will avoid the removal of existing landscaping where possible. Disturbed areas surrounding new transmission poles will be revegetated following construction to a condition reasonably similar to the preconstruction condition. Disturbed areas will be returned to pre-construction conditions or reseeded according to landowner requests and Arapahoe County requirements. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed.

## **TIER 3 GOALS AND POLICIES**

### **GOAL T3 GM 1 – PRESERVE THE RURAL, AGRICULTURAL CHARACTER OF TIER 3**

#### **Policy T3 GM 1.1 – Retain Agricultural Uses in Tier 3**

Construction and operation of Pathway will not inhibit agricultural production or operations. Pathway will result in minimal permanent impacts to agricultural lands. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed.

Through private agreements with individual landowners, the proposed alignment spans existing irrigation ditches and pivot irrigation in fields. It is designed adjacent to and parallel with section lines, parcel boundaries, and public ROW to limit impacts from the development on overall agricultural operation and production in the area.

Pathway is anticipated to provide local economic benefits during construction and long-term economic benefits should new generation resources be developed in the area.

## REFERENCES

APLIC (Avian Power Line Interaction Committee). 2006. Suggested practices for raptor protection on power lines; the State of the Art in 2006. Edison Electric Institute, APLIC and the California Energy Commission Washington, D.C and Sacramento, CA.

APLIC. 2012. Reducing Avian Collisions with Power Lines; the State of the Art in 2012. Edison Electric Institute and APLIC. Washington, D.C.

APLIC. 2024. Suggested Practices For Avian Protection on Power Lines: State of the Art in 2024. Edison Electric Institute, APLIC, and the California Energy Commission Washington, D.C and Sacramento, CA.

Arapahoe County. 2024. Arapahoe County Land Development Code. Revised July 10, 2024. Available online at: [https://files.arapahoeco.gov/Public%20Works\\_Development/zoning/Land%20Development%20Code/Arapahoe%20County%20LDC%20Rev%2002-28-2024.pdf](https://files.arapahoeco.gov/Public%20Works_Development/zoning/Land%20Development%20Code/Arapahoe%20County%20LDC%20Rev%2002-28-2024.pdf). Accessed February 2025.

Arapahoe County. 2022. 2018 Arapahoe County Comprehensive Plan. As amended through September 20, 2022. Available online at: [https://files.arapahoeco.gov/Public%20Works\\_Development/planning\\_land%20development/Long%20Range%20Planning/Comprehensive%20Plan.pdf](https://files.arapahoeco.gov/Public%20Works_Development/planning_land%20development/Long%20Range%20Planning/Comprehensive%20Plan.pdf). Accessed November 2024.

Arapahoe County. 2019. Arapahoe County, Colorado Development Application Manual. August 15, 2019. Available online at: [https://files.arapahoeco.gov/Public%20Works\\_Development/zoning/Land%20Development%20Code/DevelopmentApplicationManualRev08132024.pdf](https://files.arapahoeco.gov/Public%20Works_Development/zoning/Land%20Development%20Code/DevelopmentApplicationManualRev08132024.pdf). Accessed February 2025.

Arapahoe County. 2007. Lowry Range Sub-Area Plan. January 21, 2007. Available online at: [https://files.arapahoeco.gov/Public%20Works\\_Development/planning\\_land%20development/Lowry%20Range%20SubArea%20Plan.pdf](https://files.arapahoeco.gov/Public%20Works_Development/planning_land%20development/Lowry%20Range%20SubArea%20Plan.pdf). Accessed November 2024.

CNHP (Colorado Natural Heritage Program). 2022. Statewide Elements by 7.5-minute USGS Quadrangle (shapefile). Available online at: <https://cnhp.colostate.edu/maps/cnhp-spatial-layers/#element>. Accessed April 2022.

CPW (Colorado Parks and Wildlife). 2020. Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors (2020). Available online at: <https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/Raptor-Buffer-Guidelines.pdf>. Accessed April 2023.

CPW. 2021. Colorado Parks and Wildlife Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado. Available online at: [https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW\\_HPH-Map-Layers.pdf](https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf). Accessed April 2023.

CPW. 2025a. All Species Activity Mapping Data. Updated January 2025. Available online at: <https://www.arcgis.com/home/search.html?q=Colorado%20Parks%20and%20Wildlife&t=groups&sortOrder=desc&sortField=relevance>. Accessed October 2025.

CPW. 2025b. Threatened and Endangered Species List. Available online at: <https://cpw.state.co.us/threatened-and-endangered-wildlife>. Accessed October 2025.

CPW. 2025c. Species Profiles. Available online at: <https://cpw.state.co.us/learn/Pages/SpeciesProfiles.aspx>. Accessed October 2025.

EPA (U.S. Environmental Protection Agency). 2025. Current Nonattainment Counties for All Criteria Pollutants. Data is current as of May 31, 2025. Available online at: <https://www3.epa.gov/airquality/greenbook/ancl.html>. Accessed June 2025.

Google. 2023. Google Earth Pro Aerial Imagery. Accessed online at: <https://earth.google.com/web/>. Accessed April 2023.

HIFLD (Homeland Infrastructure Foundation-Level Data). 2022. Electric Power Transmission Lines. Available online at: <https://hifld-geoplatfrom.opendata.arcgis.com/datasets/geoplatfrom::electric-power-transmission-lines/explore?location=38.995337%2C-87.352132%2C11.99>. Accessed May 2022.

NLCD (National Land Cover Database). 2019. National Land Cover Database. Available online at: <https://www.mrlc.gov/data?f%5B0%5D=category%3ALand%20Cover&f%5B1%5D=year%3A2019>. Accessed April 2023.

USFWS (U.S. Fish and Wildlife Service). 2025b. USFWS Information for Planning and Conservation (IPaC). Available online at: <https://ipac.ecosphere.fws.gov/>. Accessed October 2025.

USFWS. 2025c. Threatened & Endangered Species Active Critical Habitat Report. Available online at: <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>. Accessed October 2025.

Xcel Energy. 2021. Our Energy Future: Destination 2030, 2021 Electric Resource Plan and Clean Energy Plan. March 31, 2021. Available online at:

[https://www.xcelenergy.com/company/rates\\_and\\_regulations/resource\\_plans/clean\\_energy\\_plan](https://www.xcelenergy.com/company/rates_and_regulations/resource_plans/clean_energy_plan). Accessed March 2022.

Xcel Energy. 2024. Community Energy Reports: Arapahoe County. Available online at: <https://xcelnew.my.salesforce.com/sfc/p/1U0000011ttV/a/R3000007sLoD/BVKYPzUpROLah4Z1j041obyNFqSmktHIVbpnnbTksOY>. Accessed September 2025.