Trapper Solar Project
Special Use Permit Application, Routt County, Colorado

JUNE 2024

PREPARED FOR

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PREPARED BY

SWCA Environmental Consultants

TRAPPER SOLAR PROJECT
SPECIAL USE PERMIT APPLICATION, ROUTT COUNTY, COLORADO

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ABBREVIATIONS

BESS	battery energy storage system
Code (the)	Routt County's Unified Development Code Resolution 2023-P-083
CPW	Colorado Parks and Wildlife
MW	megawatt
Project	Trapper Solar Project
RWE	RWE Solar Development, LLC
SUP	special use permit

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1 INTRODUCTION AND SUMMARY OF PROPOSED USE

RWE Solar Development, LLC (RWE), is filing this application for a special use permit (SUP) in accordance with Routt County's Zoning Regulations (Routt County Planning Department 2011) and Routt County's Unified Development Code Resolution 2023-P-083 (the Code) (Routt County Planning Department 2023). This SUP application is for the development of the Trapper Solar Project (Project), a utility-scale solar energy generation facility and ancillary facilities on approximately 3,030 acres of private and state-owned land in Routt County, Colorado, approximately 1.5 miles south of the town of Hayden (Project area) (Figures 1 and 2). Approximately 1,658 acres within the Project area consists of land owned by the Colorado State Land Board, and the remaining approximately 1,373 acres consists of privately owned land.

The Project is proposed within the Agriculture and Forestry zone district in unincorporated Routt County, Colorado. The Project's proposed use is a Solar Energy System, also referred to as a Solar Energy Facility and specifically, a Utility-Scale Solar Energy System. This SUP application is organized to meet Routt County's Zoning Regulations and the Code and is aligned with the *Routt County Master Plan* (Cushing Terrell 2022) and *Hayden Forward Master Plan* (Routt County Planning Department 2020). This SUP application is organized into four main sections: Section 1 introduces the Project, Section 2 indicates how this SUP application complies with the Zoning Regulations, Section 3 indicates how this SUP application meets Routt County's submittal requirements, and Section 4 indicates how this SUP application is consistent with the *Routt County Master Plan* and *Hayden Forward Master Plan*.

This SUP application includes the following appendices:

- Appendix A. Site Plan
- Appendix B. Visual Impacts Statement
- Appendix C. Dust Mitigation Plan
- Appendix D. Vegetation Establishment and Management Plan
- Appendix E. Erosion and Sediment Control Plan
- Appendix F. Stormwater and Water Quality Plan
- Appendix G. Emergency Response Plan
- Appendix H. Workforce Housing Plan
- Appendix I. Wildlife Mitigation Plan
- Appendix J. Decommissioning/Reclamation Plan
- Appendix K. Economic and Community Benefits Analysis
- Appendix L. Public Outreach Documentation
- Appendix M. Proof of Ownership
- Appendix N. Pre-Application Meeting Notes
- Appendix O. Statement of Authority
- Appendix P. Agency Correspondence
- Appendix Q. Floor Plans and Elevation Drawings
- Appendix R. Water Supply Plan

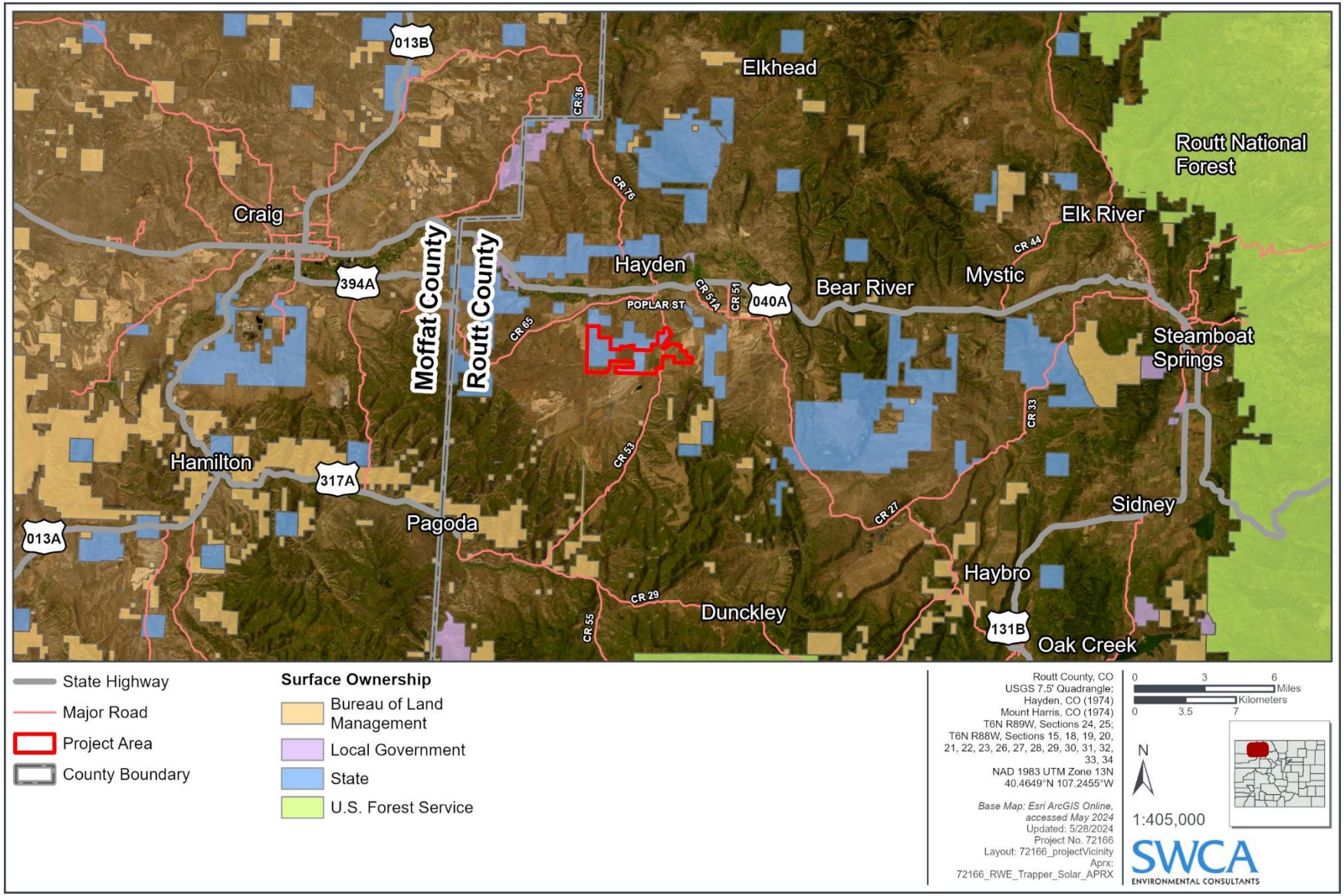

Figure 1. Trapper Solar Project vicinity.

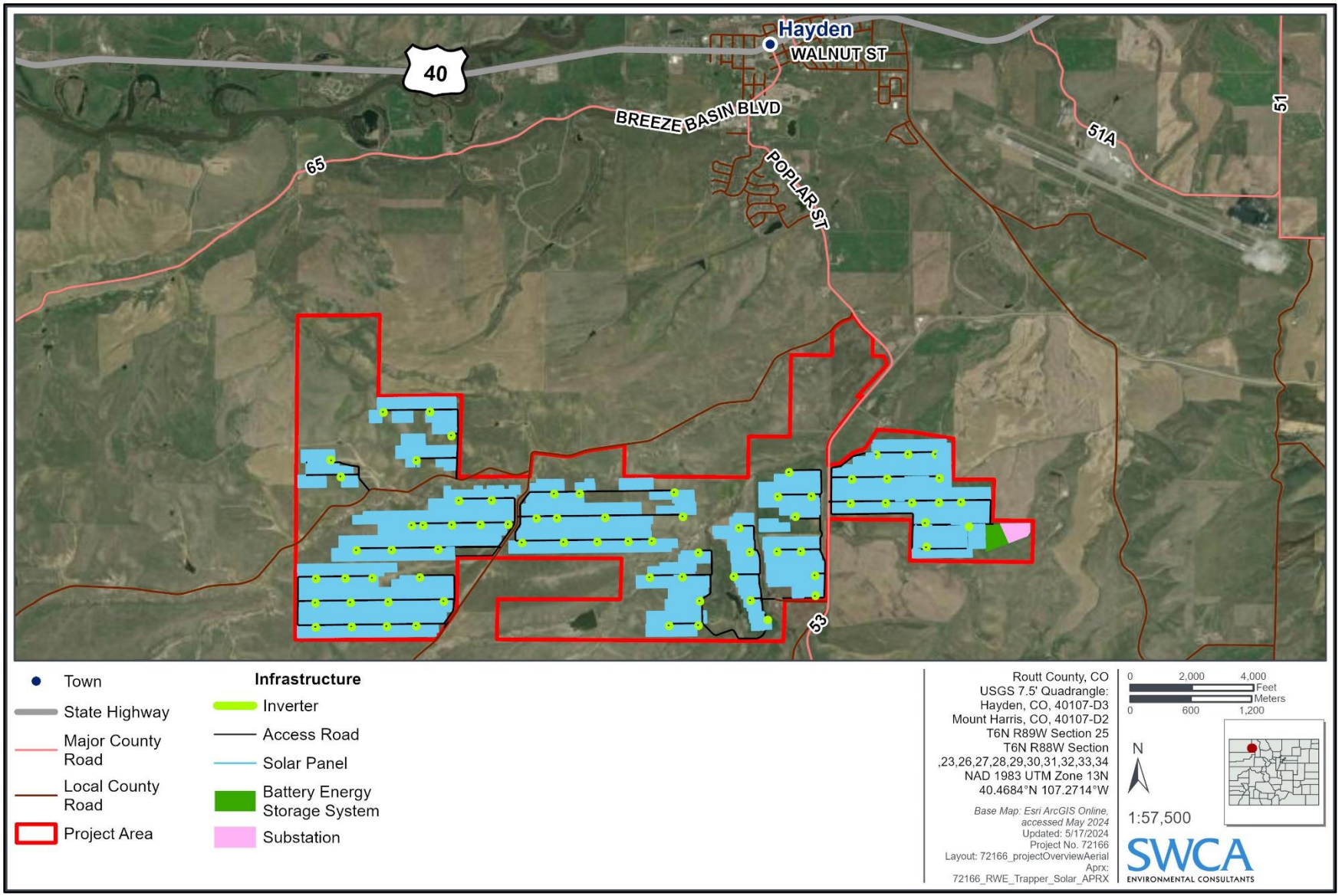

Figure 2. Trapper Solar Project area.

1.1 Project Narrative

The Project would consist of an up-to-250-megawatt (MW) alternating current utility-scale solar energy system and an up-to-125-MW (4-MWhour storage energy capacity) battery energy storage system (BESS) and ancillary facilities. The Project area would be located on approximately 3,030 acres in Sections 19–22 and 26–30, Township 6 North, Range 88 West. Approximately 1,658 acres within the proposed Project area consists of land owned by the Colorado State Land Board, and the remaining approximately 1,373 acres consists of privately owned land. Project components would include solar panels mounted on trackers arranged in multiple arrays, transformers, direct current to alternating current inverters, a collection system that connects the arrays to the BESS, a substation, an operations and maintenance building, and a switchyard. Surface-disturbing activities, including grading, would be required to allow for the development of the Project. Operational activities, namely mowing vegetation and cleaning of the solar panels, may be required for routine maintenance. Other facilities in the Project area would include two temporary construction laydown yards as temporary staging areas for panels and other equipment, temporary parking areas, and private gravel access roads. The Project footprint is approximately 1,536 acres of permanent impact and 17 acres of temporary impact (Table 1). The total solar panel coverage (i.e., the area that would be covered by solar panels when the panels are oriented parallel to the land) is approximately 384 acres (221 acres on private land and 163 acres on state land).

Table 1. Summary of Project Development Acreage

Zone District	Project Area (acres)	Solar Panel Cover (acres)	Footprint – Project Life (acres)	Footprint – Temporary (acres)
Agriculture and Forestry	3,030	384	1,536	17

Notes: The Project area is the whole SUP permit Project boundary.

Solar Panel Cover: The land area that would be covered by solar panels when the panels are oriented parallel to the land.

Footprint – Project Life: The geographic area that would be developed or altered directly during the estimated 35 years of Project operation.

Footprint – Temporary: The geographic area that would be developed or altered directly during the estimated 18 months of Project construction but reclaimed following Project construction.

1.1.1 Construction and Operation

Project construction would occur in one phase for approximately 18 months. Construction is estimated to begin in July 2026 and end in December 2027. The number of construction employees would be approximately 275. The hours of operation during construction would be from 6:00 a.m. to 6:00 p.m. Monday through Friday. County Road 53 bisects the Project area. Access to the Project area would be northbound and southbound off of County Road 53 and southbound from County Roads 59 and 61 using the Project's proposed haul route (Figure 3). RWE is exploring alternative haul routes and would consider changing an alternative route if one becomes available and is approved by Routt County. The maximum truck weight anticipated on the haul route is 85,000 pounds. The maximum number of daily trips during construction would consist of approximately 600 passenger vehicle trips per day, 12 semi-tractor/trailer trips per day, 20 water truck trips per day, and 12 grading equipment trips per day.

The Project's commercial operation date is estimated to be in December 2027. The estimated Project life is 35 years (i.e., until approximately December 2062). The number of annual operations employees would be fewer than 10 full-time on-site employees. Project operation hours would be 24 hours a day, 7 days per week. Site entrances during Project operation would be the same as those used during Project construction (see Figure 3). During Project operation, the maximum truck weight on the haul route would be 85,000 pounds, and the estimated frequency of trips would be 12 passenger vehicles per day and one semi-tractor per month.

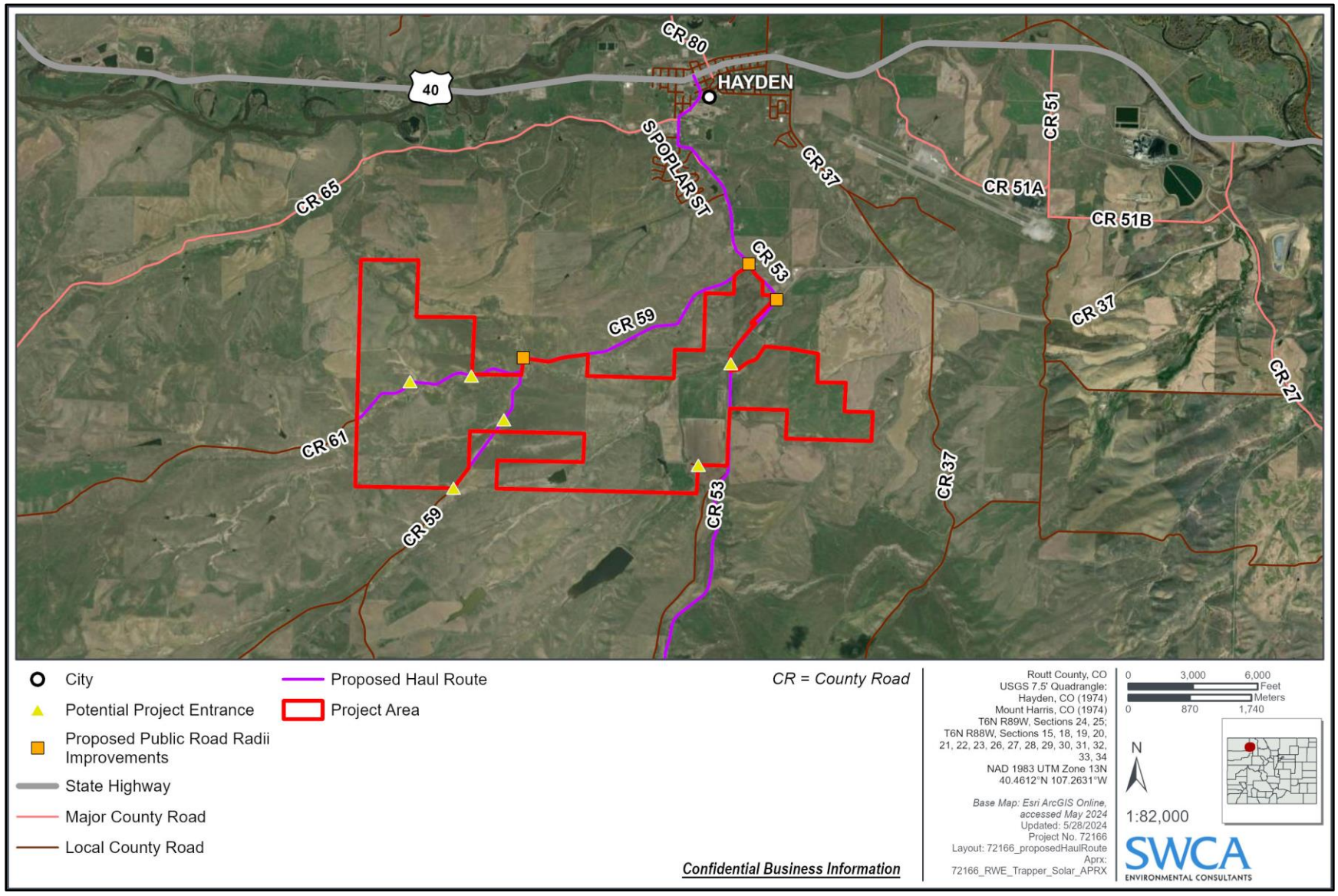

Figure 3. Proposed haul route.

1.1.2 Timetable for Obtaining all Required Permits

Table 2. Project Permits and Approvals

Permit or Approval	Responsible Agency	Expected Time Frame to Obtain
Federal		
U.S. Environmental Protection Agency spill prevention, containment, and countermeasures plan	U.S. Environmental Protection Agency	2–4 months
State		
Air Pollutant Emissions Notice (dust control permit)	Colorado Department of Public Health and Environment	4–6 months
General construction stormwater permit COR 400000	Colorado Department of Public Health and Environment	1–3 months
Local		
Right-of-way access permit	Routt County Road and Bridge Department	1–3 months
Building permit	Routt County Building Department	1–3 months
Grading and excavation permit	Routt County Road and Bridge Department	3 weeks
Oversize/overweight permit	Routt County Road and Bridge Department	2-hour turnaround for single trip permit 2- to 3-week turnaround for annual permits

1.2 Public Outreach

RWE started a public outreach campaign in April 2024 with a website to provide informational resources to the public about the Project. A call number was also established to record and collect public comments. RWE placed an advertisement and announcement in the local publication *Steamboat Pilot & Today* for an informational open house as an opportunity for the community to learn about the Project in person and provide feedback. A total of 84 letters were mailed on May 2, 2024, to stakeholders (both nearby landowners and non-landowners) inviting them to the open house held on May 22, 2024. There were 15 members of the public eight people affiliated with the Project in attendance at the open house. Public outreach documentation is included in Appendix L, Public Outreach Documentation.

2 REGULATORY COMPLIANCE

2.1 Special Use Permit Regulation Index

Table 3. Routt County Special Use Permit Application Regulation Index

Item	Included?	SUP Application Section	County Code and checklist*
Statement of authority	Yes	Appendix O	Solar Energy System Checklist
Vicinity map	Yes	Section 1, Figure 1	Solar Energy System Checklist

Item	Included?	SUP Application Section	County Code and checklist*
Written narrative/detailed description of subject site and proposed use, including the information listed on the Routt County Solar Energy System Submittal Checklist	Yes	Section 1	Solar Energy System Checklist
Site Plan	Yes	Appendix A	Solar Energy System Checklist Sections 3.1.D.5, 3.1.D.11, 3.1.D.18, and 3.1.D.24 of the Code
Floor plans and elevation drawings of proposed buildings, drawn to scale	Yes	Appendix Q	Solar Energy System Checklist
Transportation summary information	Yes	Sections 1.1.1 and 3.3	Solar Energy System Checklist
Workforce Housing Plan for housing employees during the construction phase	Yes	Appendix H	Solar Energy System Checklist
Vegetation Establishment and Management Plan, which includes Information on soil types	Yes	Appendix D	Solar Energy System Checklist
Decommissioning/Reclamation Plan	Yes	Appendix J	Solar Energy System Checklist Section 3.1.D.27 of the Code
Visual Impacts Statement	Yes	Appendix B	Solar Energy System Checklist Section 3.1.D.5 of the Code
Setbacks	Yes	Section 2.2.1.6	Section 3.1.D.6 of the Code
Screening	Yes	Section 2.2.1.8	Section 3.1.D.8 of the Code
Dust Mitigation Plan	Yes	Appendix C	Solar Energy System Checklist Section 3.1.D.9 of the Code
Fencing (see the Wildlife Mitigation Plan)	Yes	Section 2.2.1.10 and Appendix I	Section 3.1.D.10 of the Code
Vegetation Establishment and Management Plan	Yes	Appendix D	Solar Energy System Checklist Section 3.1.D.11 of the Code
Erosion and Sediment Control Plan	Yes	Appendix E	Solar Energy System Checklist Section 3.1.D.12 of the Code
Stormwater and Water Quality Plan	Yes	Appendix F	Solar Energy System Checklist Section 3.1.D.13 of the Code
Emergency Response Plan	Yes	Appendix G	Solar Energy System Checklist Section 3.1.D.14of the Code
Weed Management Plan	Yes	Appendix D	Solar Energy System Checklist Section 3.1.D.22 of the Code
Workforce Housing Plan	Yes	Appendix H	Section 3.1.D.23 of the Code
Wildlife Mitigation Plan and consultation comments from Colorado Parks and Wildlife	Yes	Appendix I	Solar Energy System Checklist Sections 3.1.D.10 and 3.1.D.24 of the Code
Economic and Community Benefit Analysis	Yes	Appendix K	Solar Energy System Checklist Section 3.1.D.28 of the Code
Proof of Ownership (lease agreements)	Yes	Appendix M	Solar Energy System Checklist

* Data from Goldich (2023) and Routt County Planning Department (2023).

2.2 Compliance with the Code and Routt County's Zoning Regulations

The following sections identify the Project compliance with Section 3.1.D of the Code. Each regulation addressed in this SUP is referenced to its respective section in the table above.

2.2.1 Compliance with Routt County's Section 3 Performance Standards

This SUP application complies with Section 3.1.D (Performance Standards) of the Code and with the Routt County's Solar Energy System Checklist (Goldich 2023). The completed checklist was submitted to Routt County with this permit application.

2.2.1.1 COORDINATION

RWE is working independently with a transmission and distribution provider to complete their interconnection process. RWE has submitted an interconnection application to Tri-State Generation and Transmission Association, Inc. A power purchase agreement and/or interconnection agreement would be submitted before access or road improvement permit(s) or building permits are issued, in accordance with Section 3.1.D.1.a of the Code. RWE has been negotiating a power purchase agreement with an offtaker since the fourth quarter of 2023 and expects to have it signed by the end of summer 2024.

2.2.1.2 SITE ACCESS

In compliance with Section 3.1.D.2 of the Code, RWE would apply for and obtain access or road improvement permit(s) from the Routt County Department of Public Works or the Colorado Department of Transportation before Project construction begins, as applicable. New access drives for the Project were designed to minimize the extent of soil disturbance, water runoff, and soil compaction in the Project area. Land clearing and disturbance activities associated with the Project would be limited to what is minimally necessary for the installation and operation of the system.

2.2.1.3 ROAD ENGINEERING STUDY

RWE would work with the Routt County Road and Bridge Department to meet compliance with Section 3.1.D.3 of the Code, which requires a road engineering study to inform installation of road improvements before Project construction begins.

2.2.1.4 HEIGHT LIMITATION

In compliance with Section 3.1.D.4 of the Code, the ground-mounted solar collectors would not exceed 25 feet in height, measured from the lowest grade below each solar collector to the highest extent of the solar collector rotation.

2.2.1.5 VISUAL IMPACTS

RWE has provided the Project's Visual Impacts Statement in Appendix B and the Project's Site Plan in Appendix A in compliance with Section 3.1.D.5.a of the Code. As indicated in the Project's Visual Impacts Statement (Appendix B: Visual Impact Statement), the Project would not be visible from U.S. Highway 40, the South Valley, or County Road 129, which have been identified in Section 3.1.D.5.a.iii. of the Code as visually important scenic vistas. Placement of the Project infrastructure would follow the

natural terrain and minimize alteration of the natural slope within the Project area to the extent practicable, preserving soils and reducing scarring and other visual impacts to hillsides. In addition, the Project's Vegetation Establishment and Management Plan is provided in Appendix D.

2.2.1.6 SETBACKS

Setbacks applicable to the Project's design are included in Table 4 and can be viewed in Appendix A.

Table 4. Required Setbacks and Project Site Plan Compliance

Setback Type	Distance	Reference	Project Site Plan Compliance
Waterbody setback	150 feet from Dry Creek 50 feet from other waterbodies	Section 3.2.D.1 of the Code	Infrastructure is set back at least 150 feet from Dry Creek and at least 50 feet from other waterbodies.
Residential buildings	100 feet	Section 3.1.D.6.c of the Code	Roads and infrastructure are set back at least 100 feet from existing residential buildings.
Public road	50–80 feet from centerline of public roads (whichever is more restrictive)	Section 2.4 of the Code Section 5.2.1 of Routt County's Zoning Regulations	Infrastructure is set back at least 80 feet from the centerline of public roads.
Minimum property line	50 feet	Section 3.1.D.6.b of the Code Section 5.2.1 of Routt County's Zoning Regulations	Project infrastructure would be set back 50 feet from non-participating land property lines. Adjoining lots may be collectively used for a single solar energy system facility across property lines and/or easement. In such event, the setback requirements of the underlying zone district would be waived as to any internal property lines of the Project.

2.2.1.7 SITE DESIGN

RWE has provided the Project's Site Plan and design in Appendix A in compliance with Section 3.1.D.7 of the Code and the Routt County's Solar Energy System Checklist. The Site Plan includes locations of proposed infrastructure, including buildings, solar panel placement, ancillary facilities, temporary staging and parking areas, access roads, and fencing. The site design for the Project takes into consideration vegetation removal and restoration costs, effectiveness in infiltration, and diversity of an ecosystem, both under and between arrays. To the greatest extent practicable, the Project is designed to avoid lands with environmental hazards. The site design for the Project incorporates wildlife corridors throughout the Project area by enclosing clumps of solar arrays with fencing and allowing wildlife passage between the clumps. Additionally, Project infrastructure is sited outside of waterbodies that cross through the Project area, which can serve as wildlife corridors. The Project is not expected to impact fishing activities within the Project area. The Project's site design complies with county setback requirements (see Section 2.2.1.6).

2.2.1.8 SCREENING

The Project has been sited to minimize the need for screening. As indicated in the Project's Visual Impacts Statement (Appendix B: Visual Impact Statement), the Project would not be visible from U.S. Highway 40, the South Valley, or County Road 129, which have been identified in Section 3.1.D.5.a.iii. of the Code as visually important scenic vistas. Placement of Project infrastructure would follow the

natural terrain to the extent practicable and would have minimal grading of the natural slope within the Project area, preserving soils and reducing scarring and other visual impacts to hillsides. Views of the BESS, substation, and switchyard would be extremely limited because of the lack of viewing opportunities from public areas and because the surrounding terrain would block the lines of sight. The exclusionary fencing surrounding the solar arrays and other Project infrastructure would act as a method of screening. The Project's substation, switchyard, and BESS are sited at least approximately 1 mile from the nearest residence, therefore, eliminating the need for further screening beyond the exclusionary fencing surrounding those facilities.

2.2.1.9 DUST MITIGATION

RWE has provided the Project's Dust Mitigation Plan as Appendix C in compliance with Section 3.1.D.9 of the Code.

2.2.1.10 FENCING

The facility would be enclosed with an 8-foot-tall wire mesh exclusion fence with at least 6-inch openings and no barbed wire on top of the fence in compliance with Section 3.1.D.10 of the Code. Additionally, RWE would place signage upon the fence warning the public of high voltage within the Project area, in accordance with the National Electrical Code. A fencing plan for the Project is included in the Project's Wildlife Mitigation Plan (Appendix I) developed in consultation with Colorado Parks and Wildlife (CPW).

2.2.1.11 GROUND COVER AND VEGETATION PRESERVATION AND MANAGEMENT

RWE has provided a Vegetation Establishment and Management Plan as Appendix D in compliance with Section 3.1.D.11 of the Code.

2.2.1.12 EROSION CONTROL

Erosion and sediment would be controlled according to the Project's Erosion and Sediment Control Plan provided as Appendix E in compliance with Section 3.1.D.12 of the Code.

2.2.1.13 STORMWATER AND WATER QUALITY

RWE has provided the Project's Stormwater and Water Quality Plan as Appendix F in compliance with Section 3.1.D.13 of the Code. RWE evaluated the 100-year floodplain to determine proper elevations for electrical equipment. There is no Federal Emergency Management Agency 100-year floodplain in the Project area. Pre-development site hydrology was analyzed as a benchmark for post-development design. The Project would adequately maintain water quality throughout the life of the solar energy system by following the guidance laid out in the Stormwater and Water Quality Plan. In addition, the Colorado Department of Public Health and Environment requires development and compliance with a stormwater pollution prevention plan during construction activities for the required general construction stormwater discharge permit COR400000. This stormwater pollution prevention plan will be developed prior to obtaining a general construction stormwater discharge permit from Colorado Department of Public Health and Environment.

2.2.1.14 EMERGENCY RESPONSE PLAN

RWE has provided the Project's Emergency Response Plan as Appendix G in compliance with Section 3.1.D.14 of the Code.

2.2.1.15 ARRANGEMENT

In compliance with Section 3.1.D.15 of the Code, arrangement of the solar arrays would ensure a parallel layout to ensure sheet flow from the drip edge. This arrangement would allow passage of runoff between each solar collector, thereby minimizing the creation of concentrated runoff. The solar arrays would be arranged in a way that allows for the growth of vegetation beneath and between the collectors. The spacing of the arrays would also provide small mammal and bird wildlife movement corridors through the Project area to facilitate wildlife passage and landscape connectivity.

2.2.1.16 UNDERGROUND CABLES

Pursuant to Section 3.1.D.16 of the Code, electrical cables in the Project area would be buried except for string wires that connect between solar collectors, collection circuits between rows of solar arrays that are no more than 4 feet above grade crossings, substations, switchyards, and circuit voltages greater than 34.5 kilovolts (where necessary).

2.2.1.17 PROVISIONS FOR BATTERY ENERGY STORAGE SYSTEMS

Pursuant to Section 3.1.D.17 of the Code, battery cells would be placed in a BESS storage container that would provide a secondary layer of physical containment for the batteries and would be equipped with cooling, ventilation, and fire suppression systems. All proposed facilities would comply with the National Electrical Code and National Fire Protection Association codes.

2.2.1.18 SOUND

Pursuant to Section 3.1.D.18 of the Code, the sound pressure level of the solar energy system and ancillary equipment would not exceed the residential standard of 55 A-weighted decibels at the property line of an adjoining non-participating lot. The Site Plan (see Appendix A) includes modeled sound isolines extending from the sound source to the property lines to demonstrate compliance with this standard.

2.2.1.19 AGRICULTURAL LANDS

RWE recognizes that agricultural land is highly valued in Routt County, and the preservation of these lands is a high priority. The applicant and facility operator would ensure that the facility does not have significant adverse impacts on agricultural lands and agricultural operations and facilitates the long-term ownership of the farmland. In compliance with Section 3.1.D.27 of the Code, the Project's Decommissioning/Reclamation Plan incorporates how this would be addressed and is provided as Appendix J.

2.2.1.20 AGRIVOLTAICS

RWE would use an upland native seed mix developed for the Project using the Colorado Seed Tool, which would provide increased habitat for native pollinator species and would meet the Department of Energy's definition of agrivoltaics (Department of Energy 2022).

2.2.1.21 PARKING

Pursuant to Section 3.1.D.21 of the Code, the Project would not include staging activities and parking of equipment and vehicles on county-maintained roads. Staging and parking would occur on-site. The Project's Site Plan (see Appendix A) includes two laydown and parking areas totaling 19.1 acres. The East Laydown and Parking Area (see Appendix A) would be re-purposed to include the footprint for the Project's operations and maintenance building to minimize the need for additional disturbance.

2.2.1.22 MAINTENANCE

Pursuant to Section 3.1.D.22 of the Code, the facility would be maintained and operated to ensure the safety of site personnel and the public in a manner that minimizes fire risk caused by vegetation. Security fencing and gates would be regularly inspected and maintained to preclude access from the public and wildlife. A weed management plan for the Project is provided within the Vegetation Establishment and Management Plan (see Appendix D).

2.2.1.23 WORKFORCE HOUSING PLAN

The Project's Workforce Housing Plan addresses compliance with Section 3.1.D.23 of the Code and is provided as Appendix H.

2.2.1.24 WILDLIFE

The Project avoids, minimizes, or mitigates impacts to wildlife such as big game, raptors, and grouse species and their habitats to the greatest extent practicable. Pursuant to Colorado Public Utilities Commission Rule 3668, a pre-development wildlife and habitat survey of the Project area was completed in August 2022 that included an aquatic resource inventory and a raptor nest survey. This survey determined that there was no habitat for federally listed or state-listed threatened or endangered species in the Project area and also concludes that no federally listed or state-listed threatened or endangered species are known to occur or likely to occur within the Project area (SWCA Environmental Consultants 2022). Five state species of special concern are known to occur or have potential to occur in the Project area: bald eagle (*Haliaeetus leucocephalus*), greater sandhill crane (*Antigone canadensis tabida*), greater sage-grouse (*Centrocercus urophasianus*), Columbian sharp-tailed grouse (*Tympanuchus phasianellus columbianus*), and northern leopard frog (*Lithobates pipiens*).

Input from three separate meetings with CPW and one additional meeting with the U.S. Fish and Wildlife Service has been incorporated into the Project's Wildlife Mitigation Plan that RWE has provided as Appendix I. In compliance with Section 3.1.D.24.a.iv.(a) of the Code, the Wildlife Mitigation Plan identifies wildlife protection measures, including seasonal timing limitations for avoiding impacts to big game and nesting raptors and creating a 50-foot setback from waterbodies and a 150-foot setback from named creeks (Dry Creek is the only named creek within the Project area), to create wildlife movement corridors and minimize impacts to aquatic resources. The Wildlife Mitigation Plan incorporates CPW's *Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado* (CPW 2023). The Wildlife Mitigation Plan includes a wildlife-friendly fencing plan, in compliance with the standards in Section 3.1.D.9 of the Code, that follows CPW's recommendations and CPW's *Fencing with Wildlife in Mind* (Hanophy 2009). Also included in the Wildlife Mitigation Plan are the dust suppression measures RWE would follow in compliance with the standards in Section 3.1.D.10 of the Code.

2.2.1.25 LIGHTING

Pursuant to Section 3.1.D.25 of the Code, lights installed for the facility's operation would comply with the following standards:

- Be limited to the inverter and/or substation locations
- Have cut-off shields and use down-lighting to avoid illuminating dark skies and reduce visibility from beyond the Project area
- Be the minimum amount of brightness necessary for operational safety and security
- Be controlled by automatic controls, including timers or motion detectors
- Not include flashing or intermittent lights

2.2.1.26 TRANSMISSION LINES

Pursuant to Section 3.1.D.26 of the Code, RWE would implement measures to minimize impacts of Project transmission lines to birds. These measures may include increasing line visibility, insulating wires to cover exposed connections, installing raptor perch deterrents on cross arms, and increasing the distance between wires so there is lesser risk of contact with energized wires.

2.2.1.27 DECOMMISSIONING/ RECLAMATION PLAN

RWE has provided the Project's Decommissioning/Reclamation Plan as Appendix J in compliance with Section 3.1.D.27 of the Code

2.2.1.28 ECONOMIC AND COMMUNITY BENEFITS ANALYSIS

RWE has provided the Project's Economic and Community Benefits Analysis in compliance with Section 3.1.D.28 of the Code as Appendix K.

2.3 Compliance with Routt County's General Performance and Development Standards

The Project has been designed to comply with Section 5 (General Performance and Development Standards) of Routt County's Zoning Regulations. The Project would not pose a danger to public health, safety, or welfare and has been designed to limit or eliminate conditions that could negatively impact the surrounding properties and environment. The Project would comply with applicable federal, state, and local regulations and standards. RWE would obtain required permits prior to construction.

2.4 Compliance with Routt County's General Standards and Mitigation Techniques for Land Use Approvals

This Project has been designed to comply with the performance standards in Sections 6.1 through 6.4 of Routt County's Zoning Regulations. In compliance with Section 6.2 (Public Road Use Performance Standards), RWE would work with the Routt County Road and Bridge Department to make road improvements, if required before Project construction, and mitigate any impacts to public roads. RWE would follow the recommendations set forth in the Project's Dust Mitigation Plan (see Appendix C) to control dust on county roads.

The Project would comply with Section 6.3 (Outdoor Lighting Standards) by installing downcast and opaquely shielded lighting. The only light source during operations would be at the operations and maintenance building, and that light source would not illuminate beyond the property lines.

Compliance with Section 6.4 (Mitigation Standards in General) of the Zoning Regulations is addressed, as applicable, in the following appendices included in this SUP application: Visual Impacts Statement (Appendix B), Dust Mitigation Plan (Appendix C), Vegetation Establishment and Management Plan (Appendix D), Erosion and Sediment Control Plan (Appendix E), Stormwater and Water Quality Plan (Appendix F), Emergency Response Plan (Appendix G), Wildlife Mitigation Plan (Appendix I), and Decommissioning/Reclamation Plan (Appendix J).

RWE has met with the Routt County Planning Department staff twice since 2022 to discuss the Project early in the Project's planning stages and as encouraged by Section 6.1 (General Approval Standards). The Project would not create significant negative impact on the surrounding areas, public roads, wildlife and wildlife habitat, water or air quality, wetlands, or public safety. The Project would not pose wildfire risk or create excessive noise, vibrations, or odors in the surrounding area.

2.5 Compliance with Routt County's Standards for all Administrative, Conditional, Minor and Special Use Permits

RWE would provide surety, in compliance with the Routt County Insurance and Surety Requirements policy, for the decommissioning and reclamation of the site prior to building permit issuance in compliance with Section 3.1.D.27a. vii.(a) of the Code.

2.6 Compliance with Routt County's Standards for Solar Energy Systems

The Project is designed to comply with Section 8.24 (Standards for Solar Energy Systems) of the Routt County's Zoning Regulations. The Project is located on a buildable lot or platted outlot. The solar energy system would be sited in compliance with the required setbacks (see Table 4 in Section 2.2.1.6 of this SUP application). The solar energy system would be located to minimize glare and visual impacts on adjacent properties and roadways by using anti-glare reflective technology on panels and incorporating a 50-foot setback form adjacent properties, an 80-foot setback from road centerline, and a 100-foot setback from residences. RWE completed a glint and glare analysis that is provided herein as part of the Visual Impact Statement in Appendix B.

3 SUBMITTAL REQUIREMENTS

This section includes items that are in Routt County's Solar Energy System Checklist but are not otherwise in Routt County's Zoning Regulations.

3.1 Site Plan

The Site Plan includes additional information as applicable in the Solar Energy System Checklist and is included with this application as Appendix A. Small wildlife movement corridors through and around the

Project area are identified in the Site Plan pursuant to Section 3.1.D.24.a.ii of the Code and as described in Appendix A.

3.2 Vicinity Map

Pursuant to the Solar Energy System Checklist, a vicinity map is included as Figure 1 in Section 1 of this SUP application.

3.3 Transportation Summary

RWE would work with the Routt County Road and Bridge Department to obtain required permits and install road improvements, if required, prior to construction. The proposed haul route for the Project is illustrated in Figure 3 in Section 1.1.1 of this SUP application. Access to the Project area would be northbound and southbound off County Road 53 and southbound from County Roads 59 and 61 using the Project's proposed haul route (see Figure 3 in Section 1.1.1). However, RWE would use an alternative route if one becomes available and is approved by Routt County. The maximum truck weight anticipated on the haul route is 85,000 pounds. The maximum number of daily trips during construction would consist of approximately 600 passenger vehicle trips per day, 12 semi-tractor/trailer trips per day, 20 water truck trips per day, and 12 grading equipment trips per day. During Project operation, the estimated frequency of trips would be 12 passenger vehicles per day and one semi-tractor per month.

RWE has provided transportation summary information to the Routt County Road and Bridge Department in compliance with the Solar Energy System Checklist. Additionally, RWE would work with Routt County to complete a road engineering study for the Project prior to construction, if required.

3.4 Floor Plans and Elevation Drawings

The Project would include construction of an operations and maintenance building. The Project's Floor Plans and Elevation Drawings drawn to scale and representing typicals for the proposed operations and maintenance building are provided in Appendix S.

4 CONFORMANCE WITH ROUTT COUNTY'S MASTER PLAN AND THE HAYDEN FORWARD MASTER PLAN

Chapter 10 of the *Routt County Master Plan* indicates that Routt County has been identified as an ideal location for solar energy production (Cushing Terrell 2022). The plan identifies Routt County's policies of supporting a transition of energy production to renewable sources and the promotion and facilitation of renewable energy production in unincorporated areas. The Project fits in the Tier 2 Targeted Growth Area for unincorporated areas and within the planned areas for future land use in the *Hayden Forward Master Plan*. The Project addresses the community's growing need for clean and sustainable energy. In the Sustainability & Climate Action section of the master plan, Policy Number 6 is to "Promote and facilitate renewable energy development opportunities in unincorporated areas" (Cushing Terrell 2022:59). Action I.HL1.1. of the *Hayden Forward Master Plan* is to "Prioritize key properties for renewable energy infrastructure including publicly owned properties (State Land Board)" (Routt County Planning Department 2020:28). The Project supports this action because it would be sited on private land and publicly owned land owned by the Colorado State Land Board.

The *Routt County Master Plan* outlines policies to guide development in the designated future growth areas of the county. The general goal of the master plan is to ensure the rural character while accommodating appropriate development. The Project would preserve the agricultural use of the land in the long term because the Project area would be reclaimed and can return to agricultural production following its decommissioning. Because the Project is not a proposed permanent installation, the Project follows the goals of land preservation in Routt County. The Project is in the Agriculture and Forestry zone district, which is discouraged from becoming residential or commercial subdivisions, and is more amenable to renewable energy development.

RWE supports the master plan process via holding a public open house for members of the community to make their opinions heard. This SUP application upholds the goals and vision of the *Routt County Master Plan* and the *Hayden Forward Master Plan*.

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