

Lightsource bp
400 Montgomery Street, 8th Floor
San Francisco, CA, 94104
(415) 523-0200
www.lightsourcebp.com

November 7, 2025

Attention: Jennifer Rutter, Planning and Development Manager
Adams County Planning and Zoning Department
4430 South Adams County Parkway
First Floor, Suite W2000
Brighton, CO 80601

Re: Big Bronco Solar Project Conditional Use Permit Applications

Dear Ms. Rutter,

Big Bronco Solar, LLC is pleased to formally submit Conditional Use Permit (CUP) applications for the Big Bronco Solar Project (Project) for review and approval, as requested by Adams County. Enclosed with this letter you will find all required submittal items and supporting documents for 1) a large-scale energy system application 2) a collector substation application 3) a Battery Energy Storage System (BESS) application and 4) a generation tie (Gen-tie) line application, as outlined in the permit application guidelines. These components are integral to one another and together comprise the Project in Adams County, Colorado. We have ensured that all materials submitted are accurate, complete, and in alignment with the requirements stipulated by the Adams County Development Standards and Regulations (Regulations).

The Project consists of an approximately 322-megawatt alternating current (MWac) photovoltaic (PV) system, a 322-MWac/4hr BESS, a collector substation, a Gen-tie line, and other appurtenant facilities such as internal access roads, perimeter security fencing, inverters and transformer equipment, an electrical collection system, and an operations and maintenance (O&M) building. The Project is situated on approximately 2,800 acres of leased privately-owned land in unincorporated Adams County, Colorado. The Project will help meet the growing need for electricity in the Denver area as data centers and other power intensive ventures drive growth. It will be well-designed and considerate of the environment and surrounding land uses while realizing the benefits it will bring as a reliable source of economic development and sustainable energy for the next 40+ years.

In addition to providing clean energy, the Project will provide local and regional benefits, helping spur economic investment, and providing significant tax revenues. Tax revenue payments from the Project will support local schools and other special districts. Currently, Big Bronco anticipates investing between \$400-500 million to construct the Project, which may vary depending on the final size and design of the Project. In addition to substantial local spending during the construction period, the direct fiscal benefit in Adams County from annual operations over the initial 40-year life of the facility is anticipated to include approximately \$39+ million in property tax payments, again depending on the final size of the Project. These economic development benefits are substantial and result from a low-impact development requiring minimal County and no school district services.

The CUP applications and all supporting information will be uploaded to the Adams County permit website for review. The applications were prepared and organized in accordance with the Adams County CUP Checklist as follows:

Submittal Items:

- 1.0 Development Application Forms and CUP Checklist
- 2.0 Application Fees
- 3.0 Written Explanation of the Project
- 4.0 Site Plan
- 5.0 Proof of Ownership
- 6.0 Proof of Water and Sewer
- 7.0 Proof of Utilities
- 8.0 Legal Description
- 9.0 Statement of Taxes Paid
- 10.0 Trip Generation Analysis
- 11.0 Supplemental Information
 - 11.1 Landowner Outreach Summary
 - 11.2 Level 1 Storm Drainage Study
- 12.0 References
- 13.0 List of Appendices
 - A Figures
 - B Preliminary Noxious Weed and Vegetation Management Plan
 - C Preliminary Decommissioning Plan
 - D Referral Agency Outreach
 - E Wetland Delineation Report
 - F Wildlife Habitat Assessment
 - G Cultural Resources Review
 - H Phase I Environmental Site Assessment
 - I Glint and Glare Analysis
 - J Emergency Response Plan

If you have any questions or need additional information, please do not hesitate to contact our Development Manager, William Vaughan, or send your inquiry to the address below.

Sincerely,



William Vaughan
Manager, Development
Lightsource Renewable Energy Development, LLC
400 Montgomery Street, 8th Floor
San Francisco, CA 94104
970.946.2494
Will.vaughan@lightsourcebp.com

Big Bronco Solar Project

Conditional Use Permit Applications for a Large-Scale Solar Energy Facility, Battery Energy

Storage System, Collector Substation, and Transmission Facilities

Submitted to Adams County

Submitted by:

BIG BRONCO SOLAR, LLC

A wholly owned subsidiary of



400 Montgomery Street, 8th Floor
San Francisco, California 94104
(415) 523-0200

For Submittal to:

Adams County Community & Economic Development Department
4430 South Adams County Parkway
First Floor, Suite W2000
Brighton, Colorado 80601
(303) 659-2120

Prepared by:



L O G A N S I M P S O N

213 Linden Street, Suite 300
Fort Collins, Colorado 80524
(970) 449-4100

November 7, 2025

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Acronym/Abbreviation	Definition
A-3	Agricultural-3 Zoning District
AC	Alternating Current
AHO	Airport Height Overlay
AIZ	Airport Influence Zone
ANO	Airport Noise Overlay
APLIC	Avian Power Line Interaction Committee
AV	Aviation Zoning District
BESS	Battery Energy Storage System
Big Bronco	Big Bronco Solar, LLC
BMP	Best Management Practice
bp	British Petroleum
BSE	Battery Storage Enclosure
CASP	Colorado Air and Space Port
CDOT	Colorado Department of Transportation
CPW	Colorado Parks and Wildlife
CUP	Conditional Use Permit
CWA	Clean Water Act
dB(A)	decibels A weighted
DC	Direct current
EPC	Engineering, Procurement, and Construction
ERP	Emergency Response Plan
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
Gen-tie	Generation tie
HB	House Bill
HVAC	Heating, Ventilation, and Air Conditioning
I-1	Industrial 1 Zoning District
kV	Kilovolt
Lightsource	Lightsource Renewable Energy Development, LLC.
MV	Medium Voltage
MW	Megawatt
MW _{ac}	Megawatt alternating current
NFPA	National Fire Protection Association
NHD	National Hydrography Dataset
NRCO	Natural Resources Conservation Overlay
O&M	Operations and Maintenance
OHWM	Ordinary High-Water Mark
POI	Point of Interconnection
Project	Big Bronco Solar Project
PSCo	Public Service Company of Colorado

Acronym/Abbreviation	Definition
PV	Photovoltaic
REC	Recognized Environmental Condition
Regulations	Adams County Development Standards and Regulations
ROW	Right-of-way
TGA	Trip Generation Analysis
U.S.	United States
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WOTUS	Waters of the U.S.

1.0 Development Application Form and Conditional Use Permit Checklist



ADAMS COUNTY
COLORADO

CONDITIONAL USE PERMIT

Community & Economic Development Department
Planning & Development

4430 S. Adams County Pkwy., 1st Floor, Suite W2000B

Brighton, CO 80601-8218

Phone: 720.523.6800

Website: adcogov.org

Conditional uses are those uses which are presumptively compatible with other land uses authorized or permitted in a zone district, but, if approved, will require more discretionary review than those uses which are authorized. In addition to meeting applicable performance standards, conditional uses may require the imposition of conditions to ensure the number and type of conditional uses and their location, design, and configuration are appropriate at a particular location.

Required Checklist Items

Development Application Form (pg. 5) **(below)**

Written Explanation **(see Attachment 3)**

Site Plan **(see Attachment 4)**

Landscape Plan **(See Appendix B Noxious Weed and Vegetation Management Plan)**

Proof of Ownership (warranty deed or title policy) **(see Attachment 5)**

Proof of Water, Sewer Services, and Utilities **(see Attachments 6 and 7)**

Legal Description **(see Attachment 8)**

Statement of Taxes Paid **(see Attachment 9)**

Trip Generation Analysis **(see Attachment 10)**

Supplemental items may be needed on a case-by-case basis. ***Email documentation will be required if supplemental items are deemed unnecessary. (see CUP Attachment 11 Supplemental Information)**

- Please contact the Planner of the Day (CEDD-Plan@adcogov.org) to determine whether a Neighborhood Meeting is necessary.
- Please contact the Engineer of the Day (CEDD-ENG@adcogov.org) to determine whether a Level 1 Storm Drainage Study is necessary

If you are applying for any of the following applications, please contact the Planner of the Day:

- Solid waste transfer station
- Scrap tire recycling facility
- Inert fill

Fees Due When Application is Deemed Complete	
Conditional Use Permit	Residential Use: \$1,200 (Additional Requests: \$400) Non-Residential Use: \$1,400 (Additional Requests: \$600)

Community & Economic
Development Department
www.adcogov.org



4430 South Adams County Parkway
1st Floor, Suite W2000
Brighton, CO 80601-8204
PHONE 720.523.6800
FAX 720.523.6998

DEVELOPMENT APPLICATION FORM

APPLICANT

Name(s): Phone #:
Address:
City, State, Zip:
2nd Phone #: Email:

OWNER

Name(s): Phone #:
Address:
City, State, Zip:
2nd Phone #: Email:

TECHNICAL REPRESENTATIVE (Consultant, Engineer, Surveyor, Architect, etc.)

Name: Phone #:
Address:
City, State, Zip:
2nd Phone #: Email:

DESCRIPTION OF SITE

Address:	<input type="text"/>
City, State, Zip:	<input type="text"/>
Area (acres or square feet):	<input type="text"/>
Tax Assessor Parcel Number	<input type="text"/>
Existing Zoning:	<input type="text"/>
Existing Land Use:	<input type="text"/>
Proposed Land Use:	<input type="text"/>

Have you attended a Conceptual Review? YES NO

If Yes, please list PRE#:

I hereby certify that I am making this application as owner of the above-described property or acting under the authority of the owner (attached authorization, if not owner). I am familiar with all pertinent requirements, procedures, and fees of the County. I understand that the Application Review Fee is non-refundable. All statements made on this form and additional application materials are true to the best of my knowledge and belief.

Name: Date:

Owner's Printed Name

Name:

Owner's Signature

2.0 Application Fees

The application fee of \$3,200 will be submitted (\$1,400 for non-residential use plus \$1,800 [three times \$600 for each subsequent application]) upon determination of a complete application by the Adams County Planning Director.

3.0 Written Explanation of Project

3.1 Project Overview

Big Bronco Solar, LLC (Big Bronco) is proposing to develop, own and operate a large-scale solar energy system known as the Big Bronco Solar Project (Project). The Project area encompasses approximately 2,800 acres of privately-owned land in unincorporated Adams County, Colorado. The proposed Project would be located north of the Colorado Air and Space Port (CASP), approximately 3.0 miles east of Denver International Airport, and 4.0 miles northeast of Watkins, Colorado. The Project area is bounded by East 72nd Avenue along the northern boundary for 2.0 miles, East 56th Avenue along the southern boundary for 0.25 miles, Imboden Road along the western boundary for 1.0 miles, and Manila Road East along the eastern boundary for 1.5 miles. See **Appendix A: Figure 1, Project Overview Map**.

The Project consists of an approximately 322-megawatt (MW) alternating current (AC) photovoltaic (PV) system and a 322-MW_{ac}/4-hour battery energy storage system (BESS). In addition, appurtenant facilities would include internal access roads, perimeter security fencing, inverters and transformer equipment, an electrical collection system, a Project collector substation, an operations and maintenance (O&M) building, and other associated facilities. The final sizing of the PV and BESS will be determined at a later date.

The Project will also include a high-voltage generation-tie (Gen-tie) transmission line for interconnection to the regional transmission grid. Currently, Big Bronco Solar, LLC is evaluating a line tap into the existing Public Service Company's (PSCo) 230 kilovolt (kV) transmission line located north of the Project area. An approximately 0.3-mile Gen-tie transmission line may be needed to connect the Project to this Point of Interconnection (POI) (Gen-tie Option 1). The Project may also pursue a connection to the existing Imboden substation, 0.75 miles to the southwest of the Project (Gen-tie Option 2).

A conceptual review meeting was held on May 14, 2025, with representatives from the Adams County Planning Department to discuss requirements, standards, and procedures applicable to the Project and these are addressed in this application. The following sections provide a detailed written explanation of the Project including the specific Conditional Use Permit (CUP) components: large-scale solar energy facility, BESS, project substation, and transmission system, and satisfy applicable requirements of the Adams County Development Standards and Regulations (Regulations) (Adams County 2020).

Within this application narrative, Big Bronco Solar, LLC is addressing four parallel CUP applications: 1) large-scale solar energy system, 2) collector substation, 3) BESS, and 4) Gen-tie transmission line to the POI. Although separate application forms and fees will be submitted, application materials have been streamlined within this submittal to address all four facilities comprising the large-scale solar energy system and requiring a CUP permit. This strategy was approved by the Adams County Planning Department at the Conceptual Review meeting on May 14, 2025.

The Project will aid in implementing Colorado's clean energy policy directive by providing significant new clean energy to customers and driving investment and economic development across the state. The Project will provide electricity to local Colorado communities, help meet growing energy demand with a clean, renewable resource, and provide jobs and significant economic benefits to Adams County while requiring minimal public services.

The Project site was selected based on a number of favorable factors that make it an ideal location for a large-scale solar energy system including: 1) rural location; 2) interest and cooperation of the participating landowners; 3) avoidance of sensitive natural resources; 4) marginal productivity for dryland agriculture and unsuitability for irrigated agriculture; and 5) co-location near an existing transmission corridor, which minimizes the need for a lengthy Gen-tie line to the POI and 5) compatibility with Adams County's goals and future lands use plans, which support renewable energy development for this location (**Appendix A: Figure 10, Future Land Uses in the Project Area**).

Big Bronco Solar, LLC has thoroughly evaluated the environment and sensitive resources during siting and planning of the Project and is working closely with regulatory agencies and other stakeholders to ensure the Project is developed in a way that minimizes impacts to environmental and other local resources and services.

3.2 Applicant/Owner information

Big Bronco Solar, LLC is the Applicant and owner of the Project. Contact information for the main point of contact is provided below.

Applicant: Big Bronco Solar, LLC
Care of Lightsource Renewable Energy Development, LLC
400 Montgomery Street, Floor 8
San Francisco, California 94104

Contact: William Vaughan Manager, Development
Phone: 970.946.2494
Email: will.vaughan@lightsourcebp.com

Owner: Lightsource Renewable Energy Development, LLC
400 Montgomery Street, 8th Floor
San Francisco, California 94104

3.2.1 Company Overview and Financial Capability

Big Bronco Solar, LLC is a wholly owned subsidiary of Lightsource Renewable Energy Development, LLC (Lightsource). Lightsource is a global leader in the development and operation of utility scale solar projects, having safely developed over 11.5 gigawatts of projects globally. Lightsource was founded in 2010 with the sole focus to develop large-scale solar power. In 2015, Lightsource began exploring international business opportunities across Europe, the Americas, and Asia. In 2017, Lightsource announced their partnership with British Petroleum (bp), rebranding to Lightsource bp with a shared mission to accelerate the deployment of solar power across the world. In 2024, bp fully acquired Lightsource bp.

The company's United States (U.S.) operations are headquartered in San Francisco, and it employs approximately 300 team members across the U.S. Several key team members are based in Colorado and possess local renewable project development experience.

The Lightsource bp renewable energy portfolio in commercial operation in the U.S. is summarized in **Table 1**.

Table 1. Lightsource bp Solar Projects in U.S. Commercial Operation

State	Project Name	Size
Colorado	Bighorn Solar	300 MW
Colorado	Sun Mountain Solar	293 MW
Texas	Impact Solar	260 MW
Indiana	Honeysuckle Solar	188 MW
Texas	Peacock Solar	187 MW
Louisiana	Prairie Ronde Solar	180 MW
Indiana	Bellflower Solar	173 MW
Texas	Elm Branch Solar	163 MW
Texas	Starr Solar	163 MW
Texas	Briar Creek Solar	153 MW
Pennsylvania	Cottontail Solar	153 MW
Alabama	Black Bear Solar	130 MW
Texas	Second Division Solar	125 MW
Pennsylvania	Penn State Solar	70 MW
Pennsylvania	Elk Hill Solar 1 and 2	42 MW
Kansas	Johnson Corner Solar	27 MW
California	Wildflower Solar	16 MW
New Mexico	Grants and Bluewater Solar	9 MW

Acronyms: MW – megawatt

Lightsource bp can combine balance sheet equity, tax equity, investor equity, and/or non-recourse debt. Lightsource bp and its parent companies have extensive experience raising both tax equity and debt project financing with numerous highly rated domestic and global investors and lenders.

3.3 Location, Property Address, and Legal Description

The Project is in Adams County, and the Project area encompasses approximately 2,800 acres. The Project area is approximately 3.0 miles east of Denver International Airport and 4.0 miles northeast of Watkins, Colorado. The Project area is bounded by East 72nd Avenue along the northern boundary for 2.0 miles, East 56th Avenue along the southern boundary for 0.25 miles, Imboden Road along the western boundary for 1.0 miles, and Manila Road East along the eastern boundary for 1.5 miles.

A Project vicinity map is provided in **Appendix A: Figure 1, Project Overview Map**. The property address is Watkins, Colorado, centered at latitude and longitude: 39.809457, -104.555031. The legal description for the Project is provided under **Submittal Item 8.0: Legal Description**.

3.4 Zone District/ Land Use of Property

The Project will be located within the Agricultural-3 (A-3) zoning district (see **Appendix A: Figure 2. Zoning in the Project Area**). The purpose of the A-3 zoning district is to provide land primarily in holdings of at least 35 acres for dryland or irrigated farming, pasture, or other related food production uses. The Project area is composed almost entirely of cultivated crops (99 percent) consisting of winter wheat and corn (see **Appendix A: Figure 3. Landcover in the Project Area**).

The proposed photovoltaic solar, BESS, substation, and transmission facilities are allowed uses in the A-3 zoning district as part of a Major Energy Facility pursuant to a CUP.

Properties surrounding the Project area are zoned as A-3, Industrial 1 (I-1), Aviation (AV), and City of Aurora Airport District. There are six community scale solar projects and a high voltage substation within 1.5 miles of the Project.

3.5 Assessor's Tax Parcel Number

Parcels, street addresses, and ownership information for the overall Project area can be found in **Table 2**. Parcel information is also shown in **Appendix A: Figure 4. Project Context Map**.

Table 2: Project Area Parcel Data

Assessor's Parcel Number	Acres in Project Area	County Zone District	Property Owner	Owner Address
0181700000022	320	A-3	Lanny J. Larson and Deborah L. Larson Trustees of the Larson Revocable Trust	15 Rainbow Valley Road Placitas, New Mexico 87043-8800
0181708400001	78.6			
0181708100001	160			
0181709100001	319			
0181700000009	280			
0181709400001	286.2			
0181709300001	36.1	A-3	Matthew Hawthorne and Brandy Hawthorne	13343 Jersey Street Thornton, Colorado 80602-9218
0181700000006	640	A-3	Minis Adon Corporation, care of Robert D. Selim	4904 Kingston Drive Annadale, Virginia 22003-6149
0181700000010	628.8	A-3	Qualls and Palmer, LLC	6288 Station Mill Drive Peachtree Corners, Georgia 30092-1890
0181700000187 (Gen-tie only Option 2)	320	AV	Adams County	4430 S. Adams County Parkway, Suite C5000A Brighton, Colorado 80601-8204
0181700000288 (Gen-tie only Option 2)	155.7	Aurora	Western Transport, LLC ¹	1331 17th Street Suite 1000 Denver, Colorado 80202-1566
0172700000135 (Gen-tie only Option 1)	319.8	A-3	Davis Farm, LLC, care of Dennis T. Davis	7300 West Stetson Place Apartment 45 Denver, Colorado 80123-2418
Total Acres	2,748.7 (Exclusive of Gen-tie Options)			
Source: Adams County Property Search 2024				
Acronyms: A-3 – Agricultural 3 zoning district, AV – Aviation zoning district, Gen-tie – generation tie				
¹ Western Transport lands have been annexed into Aurora.				

3.6 Participating Owners and Interests

Documentation of all properties under option to lease in the Project area is included under **Submittal Item 5.0: Proof of Ownership**. Property ownership has also been confirmed through a title search.

3.7 Large-Scale Solar Energy Facility Description

Big Bronco Solar, LLC is proposing to develop, own, and operate a large-scale solar energy facility, located in unincorporated Adams County, approximately 4.0 miles northeast of Watkins, Colorado (see **Appendix A: Figure 1. Project Overview Map**). The large-scale solar energy facility is part of the overall Project (solar facility, collector substation, BESS, and Gen-tie line), which consists of approximately 2,800 acres of privately owned land located in the A-3 zoning district. In accordance with Adams County Regulations, large-scale solar facilities are allowed in the A-3 zoning district pursuant to a CUP.

The large-scale solar energy site is composed predominately of cultivated croplands consisting of winter wheat and corn (see **Appendix A: Figure 3. Landcover in Project Area**). The site location was

selected based on several factors, which make it an ideal location for a large-scale solar energy system, including:

1. The Project's rural location, which is not near existing or proposed subdivisions;
2. The interest and cooperation of participating landowners;
3. Avoidance of, and the potential for minimal conflicts with wildlife and other sensitive natural resources;
4. The site's marginal productivity for dryland agriculture and unsuitability for irrigated agriculture; and
5. Proximity to the existing PSCo transmission system. Co-locating the large-scale solar energy facility, collector substation, and BESS near an existing transmission corridor limits potential for adverse impacts to wildlife and visual resources by minimizing the need for a lengthy transmission line to the POI.

Within the Project area, approximately 1,880 acres will be utilized for the solar facilities based on preliminary design. The remaining acreage within the properties will be utilized by the Project to accommodate wildlife corridors, avoidance of water resources and drainages, mineral access set-asides, and other required setbacks.

The proposed facility will include the PV solar panels and tracking systems, inverters and transformer equipment, an O&M building, internal access roads, perimeter/security fencing, and an underground electrical collection system that will connect the electrical energy generated by the PV system to the collector substation and BESS (see **Submittal Item 4.0: Site Plan**). The Project will be designed to conform to all requirements of the fire code as currently adopted, including any fire break requirements.

The proposed Project will consist of approximately 798,444 PV solar modules, rated at 435 MW (or higher) direct current (DC). The solar modules will be mounted on single axis trackers running in a north-to-south array orientation, which rotate slowly throughout the day to follow the sun and maximize energy capture. At a maximum tilt, the solar arrays will be no more than 19 feet tall, as measured from the highest grade below each solar panel. PV modules will be mounted to installed piles for structural support.

Most of the site will contain tracker solar arrays. Within each array, DC electricity will be generated by the PV panels and then sent by wire (cable) to a power conversion station (one station per array). At the power conversion station, or string inverters, the DC power is converted to AC power. The PV system includes 88 proposed inverters. The power is then sent to a pad mount transformer to convert output from low voltage to medium voltage (MV) (34.5 kV). Underground MV collection cables will route power to the onsite substation, where it will interconnect with the transmission grid.

3.7.1 Operations and Maintenance Building

The Project will include construction of an approximately 500-square-foot O&M building located within the fenced perimeter, as shown on the Site Plan (**Submittal Item 4.0: Site Plan**). This building is anticipated to provide space for the operations staff to service the ongoing O&M needs of the Project. There will also be a small operations control room for onsite monitoring of the PV System.

3.7.2 Security Fencing

Consistent with Colorado Parks and Wildlife (CPW) recommendations, a 7-foot-tall wildlife friendly (e.g., no top barbed wire) fence will be installed around the perimeter of the Project area (CPW 2009). The Project substation, and the BESS will include a chain link fence with barbed wire for security purposes, and in accordance with minimum setback requirements (see **Submittal Item 4.0: Site Plan**). Big Bronco Solar, LLC will take proactive measures to regularly monitor the enclosed facility during operations to reduce the risk of unintended wildlife entrapment.

3.7.3 Access Roads

Primary access to the Project site is from Imboden Road, approximately 5 miles north of East Colfax Avenue/U.S. Highway 36 (see **Appendix A: Figure 5. Project Haul Routes**). Access gates located at entry points will be identified with appropriate signage and equipped with “Knox Box” style locks to allow for first responder access. Private access roads within the security fence will be located strategically throughout the PV arrays. Pathways leading to major equipment pad locations will be all-weather rated to facilitate year-round access and circulation for operation and maintenance activities. All roads will be designed in accordance with building codes and local fire district requirements, among other requirements. Big Bronco Solar, LLC will submit construction plans to the Adams County Development Review Engineering Division for the private driveway and access road improvements, subject to approval by the Bennet Fire Protection District.

3.7.4 Lighting

Motion-activated Project lighting will likely be placed at the O&M building, BESS, and substation and will be designed to meet code requirements, while providing the necessary illumination for safety and security. The lighting will be downward-facing and shielded to focus illumination on specific areas.

3.7.5 Temporary Staging and Laydown Area

An approximately 2-acre temporary staging and laydown yard will be established to support construction activities associated with the Project. The yard will serve as a centralized location for the delivery, storage, and organization of equipment, construction materials, and temporary facilities. Typical uses include offloading and storing PV modules, mounting hardware, cabling, inverters, and construction tools, as well as housing construction trailers, portable restrooms, dumpsters, and employee parking. The staging yard will be located on previously disturbed or minimally vegetated land. Site preparation may involve minor grading and the installation of erosion and sediment control measures, as needed. The yard will be secured with temporary fencing, and dust control measures will be implemented throughout the construction period.

Upon completion of construction, all materials and temporary structures will be removed, and the site will be restored to pre-construction conditions or as otherwise specified in landowner agreements.

3.7.6 Design Standards

Geotechnical and structural engineering will determine designs for the module racking, inverter, transformers, and any other pertinent equipment. Racking structures are anticipated to be supported

by driven galvanized steel piles, embedded into the ground. Facilities related to the large-scale solar energy facility (including access roads) will be constructed in accordance with all industry standards and all applicable building codes and Regulations, including applicable Adam's County Design Requirements and Performance Standards.

3.8 Battery Energy Storage System Description

The Project will also include construction and operation of a 322-MW BESS with a 4-hour duration (1,200 MW-hours). The BESS will charge from the co-located PV facility and, when needed, from the grid to support grid stability. It will store energy during periods of low demand or high solar generation and discharge energy during peak demand or low solar output, enhancing grid reliability and renewable energy integration.

The BESS comprises approximately 320 Battery Storage Enclosures (BSEs), each housed within climate-controlled and fire-protected environments. These multiple layers of fire safety include robust prevention measures such as thermal management, fire-resistant construction materials, and safe electrical design; advanced fire detection systems that provide early warning through continuous monitoring of temperature, smoke, and gas sensors; and mitigation solutions like automatic suppression systems to contain and extinguish any incipient fires rapidly.

Each BSE charges and discharges through the Medium Voltage (MV) bus of the Project substation. Charging power flows from the substation MV bus, where voltage is stepped down via a transformer from 34.5 kV to battery-level voltage. An inverter then converts AC to DC, which the BSE draws to charge its batteries. During discharge, the BSE releases DC power that the inverter draws and converts back to AC. This AC power is then stepped up to 34.5 kV by the transformer and pushed back to the substation for grid use. Power for charging may come from the PV Plant, the grid, or a combination, based on market conditions.

While LFP Lithium Iron Phosphate is the leading battery chemistry under consideration, Big Bronco Solar, LLC is evaluating multiple chemistries to ensure optimal performance, safety, and lifecycle cost. The BESS will be sited adjacent to the Project substation, within a secure, fenced perimeter, and will occupy a graveled area of approximately 23 acres. Battery containers will be arranged according to Tier 1 design standards, with each container (Tesla Megapack 3) measuring approximately 23.6 feet wide x 5.5 feet deep x 8.3 feet wide, and typically painted white or other light color to enhance thermal performance.

3.8.1 Thermal Management and Fire Safety

Each battery container will be equipped with a liquid cooling system, ventilation, and air conditioning (HVAC) system to maintain optimal operating temperatures and humidity. The enclosures will include aspirating smoke detectors and temperature sensors that continuously monitor environmental conditions. These sensors feed data to the battery control system, which works in tandem with the battery management system and energy management system to ensure safe and efficient operation.

The battery management system is responsible for:

- Temperature regulation
- Battery operation and health monitoring,
- State of charge management
- Battery cell balancing
- Fault detection and isolation

The battery control system aggregates data from all battery racks and BSE systems, while the energy management system oversees system-wide operations, initiating safe shutdowns in response to faults of threshold violations.

3.8.2 Safety and Emergency Systems

All safety systems are designed to minimize fire propagation risk and protect personnel and infrastructure. The BESS is designed with multiple layers of safety and emergency response features, including:

- Automatic fire detection and suppression systems
- Gas-based fire suppression agents (e.g., NOVEC 1230)
- Active ventilation to prevent gas accumulation
- Remote monitoring and shutdown capabilities via a 24/7 off-site control center

Table 3 presents a list of common BESS safety features that Big Bronco Solar, LLC installs in BESS containers for Project safety.

Table 3. BESS Safety Features

BESS Component	Description	Purpose
Smoke Detectors	Aspirating detectors linked to central fire alarm system	Fire detection and alerting
Temperature Sensors	Located at ventilation slots for accurate readings	Thermal monitoring and alerting
Battery Management System	Redundant protection, voltage/temp monitoring, cell balancing	System health and fault detection
Energy Management System	Supervises enclosure, triggers alarm, manages shutdowns	Operational safety and control
Dry Pipe System	Fire suppression via external fire department connection	Fire containment and suppression
Suppression Agents	NOVEC 1230, water-based systems	Fire suppression and cooling
Sprinklers/Nozzles	High-pressure water spray (≥ 10 bar, ≥ 20 liter per minute)	Fire suppression
Active Vents	Enables airflow to prevent gas buildup	Hazard mitigation

Acronyms: BESS – Battery Energy Storage System

BESS facilities will be controlled and monitored by trained technicians 24 hours a day, 7 days a week, and any anomalies will trigger automated responses and alerts to the control center. Auxiliary loads for the BESS, including the heating, ventilating, and air conditioning and fire suppression systems, will draw power either from the grid or from the local distribution source.

Final siting of the BESS and substation is pending transmission studies being performed by PSCo and determination of the final POI. Two potential locations have been provided on the Site Plan. A site plan is provided under **Submittal Item 4.0: Site Plan** and details the potential locations of the BESS facilities.

3.9 Collection Substation Description

The Applicant proposes to develop, own, and operate a 230 kV collector substation within the Project area. This substation is a critical component of the Project's energy delivery infrastructure, serving as the primary transition point between the Project's MV collection system and the high-voltage transmission system.

The collector substation will receive electrical power from the solar PV arrays and the BESS via 34.5 kV underground collection cables. These cables will connect the PV inverters and BESS transformers to the substation, where the voltage will be stepped up to 230 kV for interconnection with the PSCo transmission network.

The collector substation will be located within an approximately three (3) acre fenced and graded enclosure (see **Submittal Item 4.0: Site Plan**). Key components of the substation will include:

- Circuit breakers
- Disconnect switches
- Surge arresters
- Station service transformer for auxiliary services
- Revenue metering equipment
- Optional main power transformer
- Perimeter security fencing

In addition to the substation components described above, the fenced area will contain an electrical equipment (or control) enclosure and capacitor bank, and fiber optic communication cables will run between the control enclosure and the solar inverters. Data and control signals will be transmitted over to a remote-control center where the Project will be remotely monitored and controlled 24 hours, 7 days a week, 365 days a year.

3.9.1 Transmission Interconnection

After stepping up the voltage, the collector substation will transfer the Project's energy via an overhead Gen-tie transmission line to the POI. Two interconnection options are currently under consideration

Option 1: An approximately 0.3-mile overhead Gen-tie transmission line to the POI, which is anticipated to require a line tap into the existing PSCo transmission line located north of the Project area.

Option 2: An approximately 1.25-mile Gen-tie transmission line, consisting of both overhead and underground portions, to the existing Imboden substation.

Final siting of the substation is pending transmission studies being performed by PSCo. Two potential locations have been provided on the Site Plan (see **Submittal Item 4.0: Site Plan**).

3.9.2 Access

Access to the substation will be provided via a 20-foot-wide access road capable of supporting the delivery of large equipment, including transformers weighing over 250,000 pounds. The road will also meet fire access requirements, including any fire break requirements. The substation yard will include a combination of gravel and concrete surfaces, and the entire 3-acre area will be considered impervious for stormwater management and permitting purposes.

3.9.3 Security Fencing

The proposed substation site is located within the Project area, which will be surrounded by exclusion fencing to prevent wildlife and humans from entering. The substation and BESS site will also be surrounded by security fencing for additional safety and security (see **Submittal Item 4.0: Site Plan**). The Applicant will take proactive measures to regularly monitor the enclosed Project and substation areas during operations to reduce the risk of unintended wildlife entrapment or injury.

3.9.4 Lighting

Motion-activated lighting may be installed at the substation entrance gate and within the substation security fence. All lighting will be downward-facing and shielded and designed to meet code requirements while minimizing light pollution and ensuring safety and security.

3.9.5 Design Standards

The substation will be designed and constructed in accordance with all applicable building codes, fire codes, and industry standards, including fire break requirements, and Adams County Design Requirements and Performance Standards. Geotechnical and structural engineering studies will inform foundation design for all substation components.

3.10 Transmission System Description

The Project will also include a Gen-tie transmission line to deliver energy generated from the solar facility to the regional transmission grid and Big Bronco Solar, LLC is currently considering options for power offtake (see **Submittal Item 4.0: Site Plan**). The locations for the Project substation and Gen-tie have not yet been finalized but will likely be in one of two locations as shown in the Conceptual Site Plan. The Gen-tie options are as follows:

Gen-tie Option 1 – Includes a line tap to interconnect the Project to the existing PSCo 230 kV transmission line, which runs north of the Project leased lands. This POI option would require a short, approximately 0.3 mile long 230 kV overhead Gen-tie to the existing PSCo system. Land for this option has been secured via an option to purchase 30 acres.

Gen-tie Option 2 – Under Option 2, the Project would interconnect at PSCo’s Imboden substation located approximately 0.75 miles southwest of the Project area. This alternative would require up to an approximately 1.25 mile long 230 kV overhead Gen-tie to the existing Imboden substation located outside of the Project area. While the transmission connection is still in the planning phase and the final route is pending final engineering design, a conceptual transmission corridor for this alternative is shown on **Submittal Item 4.0: Site Plan**. The Project is negotiating additional leases with the private landowners for this Gen-tie option.

The final electrical design will determine the final system design, but the transmission towers will likely consist of steel monopoles, with a height of 80 to 120 feet above ground. Within the Gen-tie line corridor, the transmission line will be constructed within a 150-foot-wide right-of-way (ROW). Transmission structures will be sited to avoid sensitive environmental resources and will incorporate Avian Power Line Interaction Committee (APLIC) recommendations to reduce collision risks for avian species (APLIC 2012). An overview of the transmission system is shown under **Submittal Item 4.0: Site Plan**.

3.10.1 Gen-Tie Structures

Currently the proposed transmission pole structure types that would be used for the Gen-Tie Line are self-supporting, steel monopole structures. The monopoles may support up to six conductor cables (depending on whether the final design is single-circuit or double-circuit), along with lightning protection and communication cables suspended between the structures. The towers will be spaced approximately 1,000 feet apart, with an estimated six poles per mile. Final spacing and design may vary to meet specific engineering considerations. For a single-circuit design, three conductors comprising the three-phase single-circuit line and one fiber optic cable would be supported by the monopole structures. In total, the Gen-Tie Line would require approximately two to four structures.

3.10.2 Foundations

Self-supporting tubular monopole support structures require a single footing for the structural base, which minimizes the work area necessary for each structure and can aid in reducing overall construction time and impact. Depending on the soil conditions encountered at the installation site, foundations are anticipated to range from 3 to 6 feet in diameter and 12 to 30 feet in depth. Final foundation depths would not be known until exact structure locations have been determined and a detailed geotechnical analysis has been performed. Current desktop level analysis indicates that structures would likely be directly embedded. However, if soil conditions do not prove to be conducive to this installation method, then drilled pier foundations may be utilized. Like direct embedment, drilled piers require a relatively minimal work area for installation, but offer more stability in areas of weaker soils.

3.10.3 Conductors, Insulators, Associated Hardware, Overhead Ground Wires and Fiber Optic Communications

The Gen-Tie Line will likely utilize a three-phase conductor system, likely in a delta configuration, with one conductor per phase. The conductors will be aluminum-stranded with a steel core, where aluminum carries the electrical current and steel provides structural strength. Final conductor type and configuration will be determined during detailed engineering.

To ensure safety and compliance with the National Electric Safety Code, the minimum conductor height will be 23 feet at maximum sag under high-temperature or ice-loading conditions. Structure heights will vary based on topography and clearance requirements.

An optical ground wire will be installed atop the structures to protect against lightning strikes and to provide a communication path for system protection and control. Lightning current will be safely grounded through the optical ground wire and structure.

Three braced-post or strain-insulator assemblies would be used to position and support each conductor, while maintaining electrical design clearances between the conductors and the structure. Typically, braced-post insulators would be used for 230-kV tangent structures, whereas strain insulators would be used for 230-kV dead-end structures.

3.10.4 Access

No permanent roads would be constructed to support the Gen-Tie Line. The Gen-Tie Line would primarily access structure locations using overland techniques within its own ROW which could result in the creation of temporary two-track roads. These would be reclaimed in coordination with local agencies using an approved seed mix.

3.11 Emergency Coordination and Preparation

Big Bronco Solar, LLC has developed a Project-specific draft Emergency Response Plan (ERP) (see **Appendix J: Emergency Response Plan**), which outlines potential hazards, response actions to emergency situations, and key emergency personnel and coordination to reduce the risk of wildfire, and other emergency events. Big Bronco Solar, LLC will work with the Bennett Fire Protection District to finalize the ERP.

The ERP will provide an overview of potential emergencies. Planned response actions in the event of an emergency would be provided by the site operations contractor and engineering, procurement, and construction (EPC) contractor for the Project. Actions provided in the ERP are intended to minimize health risks to solar/BESS technicians (when onsite), people in the surrounding community, and impacts to the environment. The plan will cover emergency procedures for the following events:

- Wildfire event
- Severe weather event
- Fire response event
- Site evacuation
- Earthquake safety checklist
- Capacity/transmission event

- Environmental events
- Immediate site evacuation procedure
- Delayed site evacuation procedure
- Designated egress routes and muster areas for evacuations
- Personnel injuries and serious health conditions

Safe and reliable operation is paramount to the success of the Project over the life of the facility. In addition to the site-specific ERP, Big Bronco Solar, LLC has established O&M procedures (scheduled and unscheduled) that would be implemented to ensure the safe and efficient operation of the Project and associated facilities.

3.11.1 Fire Prevention:

Firefighting tactics for the Project will be defensive in nature, with a primary focus on protecting adjacent infrastructure and land while allowing the affected battery system to safely burn out under controlled conditions based on recommendations from the manufacturer. Further details can be found in the ERP.

The layout of the site is designed to create enough separation between the components to ensure no thermal propagation between the containers as required by UL 9540, which states that ESS containers should be separated by at least 3 feet (1 meter). This means that container to container propagation is unlikely and that the containers are designed to contain the fire.

The Project will comply with the State of Colorado's fire prevention regulations, specifically the Building and Fire Code Adoption and Certification of Inspectors for Fire & Life Safety Programs (8 Colorado Code of Regulations 1507-101). This includes adherence to the following adopted codes and standards:

- 2018 International Building Code (Adams County currently adopted)
- 2018 International Fire Code (Adams County currently adopted)
- 2021 International Wildland-Urban Interface Code
- National Fire Protection Association (NFPA) standards, including:
 - o NFPA 850 – Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations (NFPA 2020).
 - o NFPA 855 – Standard for the Installation of Stationary Energy Storage Systems (NFPA 2023).

These standards provide comprehensive guidance on fire prevention, protection, and hazard mitigation for energy storage and generation facilities.

3.11.1.1 Wildfire Risk and Vegetation Management

The Project site is in a flat, predominantly agricultural landscape, which presents a low baseline wildfire risk. The Project area is intersected by wide gravel roads, which will serve as natural fuel breaks, and is surrounded predominantly by agricultural fields, limiting the potential spread of wildfire. While many agricultural fuel models are considered non-burnable (Scott and Burgan 2005), wildfires can still occur under abnormally dry conditions.

To mitigate wildfire risk, Big Bronco Solar, LLC will implement a **Noxious Weed and Vegetation Management Plan (Appendix B)** that includes:

- Establishment and maintenance of fuel breaks
- Fuel load reduction in and around the Project area
- Promotion of native vegetation
- Control of non-native and invasive species

These measures will be incorporated into the Project's ERP.

3.12 Construction Activities

Project construction generally will include the following activities:

- Installation of stormwater and erosion control measures;
- Site grubbing and grading;
- Installation of fencing and roads;
- Construction of solar arrays, collection system, BESS, collector substation, and transmission;
- Testing and commissioning of facilities; and
- Reclamation/revegetation of disturbed areas.

The construction process will involve vegetation grubbing, mowing, and grading as necessary across the site. Areas disturbed, but not surfaced with gravel, will be revegetated via reseeding with native grass seed.

During construction, the Project is expected to have a peak workforce of up to 400 workers. Construction traffic will consist of larger delivery vehicles bringing construction equipment and materials to the site, as well as daily truck trips associated with the construction workforce. A **Trip Generation Analysis (TGA)** estimating maximum daily traffic trips for the Project is included under **Submittal Item 10.0**.

Construction is anticipated to occur over an approximately 12- to-20-month period, with anticipated completion as early as 2029, and will conclude after facility testing and commissioning and connection to the utility substation.

3.12.1 Dust Control

The construction contractor will be responsible for implementing dust control measures to ensure a safe environment during the construction phase. These measures will mitigate fugitive dust emissions during construction. Fugitive dust will be controlled by implementing the following measures as appropriate:

- 1) Reducing vehicle and equipment speeds on unpaved surfaces;
- 2) Periodic application of clean water to exposed disturbed surface areas and along 72nd Avenue, which is a soil/dirt road. Application of water will be via contracted water trucks.
- 3) Treating exposed soil surfaces with stabilizers such as polymers, lignin, or chemical binders to reduce dust generation by enhancing soil cohesion and preventing erosion; and

- 4) Reseeding bare soil areas to assist in stabilizing the soil surface to reduce dust emissions through natural ground cover.

3.12.2 Vegetation Management

To guide revegetation efforts and minimize wildfire risk at the site, Big Bronco Solar, LLC has developed a **Preliminary Noxious Weed and Vegetation Management Plan (Appendix B)**. This plan outlines the procedures for reclaiming disturbed sections of the site, implementing construction best management practices (BMPs), and applying suitable weed control measures throughout the Project's construction and O&M phases. It also outlines methods for minimizing fire risk at the site, in accordance with the adopted fire code.

The goal of the Vegetation Management Plan is to promote uniform growth of perennial vegetation for soil stabilization at the Project. Mowing and grazing are the primary methods utilized for maintaining vegetation height and controlling weed populations. If grazing is employed, a Grazing Management Plan will be developed by the selected grazer and approved by Big Bronco Solar, LLC. In general, vegetation at the Project will be maintained at approximately an 18-inch height. This integrated plan will require observing the conditions of the site and determining the appropriate maintenance techniques based on site specific findings.

3.13 Operation and Maintenance Activities

In general, solar facilities require minimal O&M activities. Once installed, the solar panels will operate continuously during daylight hours year-round. The operational phase is anticipated to last an initial 40 years. During this phase, only monitoring and maintenance personnel will routinely access the large-scale solar energy site. Big Bronco Solar, LLC anticipates a peak of up to 15 operational employees on site at one time; however, most routine day-to-day operations will likely require only one to three employees. The maintenance of onsite vegetation and weed control will be handled in accordance with the **Preliminary Noxious Weed and Vegetation Management Plan (Appendix B)**. Big Bronco Solar, LLC will conduct routine landscape maintenance, ensuring that designated portions of the Project are consistently kept in good condition, including regular removal of weeds, trash, and debris. The tracking systems and BESS will both be monitored remotely, as well as by onsite personnel. In addition, O&M activities will require panel washing approximately twice per year. This typically involves hauling water via truck to the site to use for washing. Occasionally, major repairs or equipment replacements may require additional employees or contractors onsite.

Routine O&M activities for the Project substation and BESS will be conducted to ensure safe, reliable, and efficient performance of the facilities. Typical activities include visual inspections of electrical equipment such as transformers, inverters, breakers, relays, BSEs, and HVAC units. Electrical testing (e.g., thermographic scans, relay testing, and grounding checks) will be performed periodically, along with equipment maintenance such as cleaning, lubrication, tightening of connections, and battery system diagnostics.

For the BESS, specific tasks will include state-of-charge monitoring, thermal management system checks, inspection of fire suppression and safety systems, and testing of control software and communications equipment.

Vegetation control is performed to maintain clearances and fire safety, while security measures (e.g., fencing, lighting, and access controls) are regularly inspected. Remote supervisory control and data acquisition systems provide continuous monitoring and alerting for both the substation and BESS components. O&M activities are scheduled monthly, quarterly, or annually, with corrective maintenance conducted as needed.

Routine O&M for the 230 kV Gen-tie line will include regular inspections to assess conductor condition, insulators, hardware, and structure integrity. Vegetation management will be conducted within the transmission corridor to maintain clearance and fire safety. Infrared scans and other diagnostic testing may be performed to detect hotspots or electrical faults.

Access roads will be maintained as needed to ensure safe entry for inspection and repair crews. Corrective maintenance is performed in response to weather events, alarms, or damage. O&M activities are typically conducted on an annual or semiannual schedule, in accordance with utility standards and reliability requirements.

3.14 Project Decommissioning

At the end of the Project productive life, facilities will be dismantled and removed from the property and the land will be reasonably restored to the agreed upon vegetative cover and stabilized to minimize erosion. **Appendix C: Preliminary Decommissioning Plan** outlines the general process, timelines, and responsibilities for decommissioning the Project.

Big Bronco is requesting Adam's County approval to allow the following facilities to remain in place at the end of the Project's life.

- Underground foundations and steel piles;
- Underground electrical cables and conduits; and
- Internal access roads.

3.15 Public Road Use

Primary access to the Project will occur via Interstate 70 to Watkins Road, then east on to U.S. Highway 36/East Colfax Avenue, and then north approximately 5 miles along Imboden Road. Haul routes and road surface types are shown within **Appendix A: Figure 5 Project Haul Routes and Figure 6 Road**

Surfaces in the Project Area. If alternate routes become necessary, Big Bronco Solar, LLC will coordinate with the Adams County Public Works Department.

Construction of the Project will occur during daylight hours over the 12- to 20-month construction period commencing in 2027, with an in-service date expected in 2029. During peak construction, it is estimated that approximately 300-400 personnel could be onsite or actively involved in an off-site capacity. Workers are anticipated to originate mainly from the Denver Metro Area, and the workforce is likely to arrive between 6AM and 7AM (Peak AM Hour) and leave between 4PM and 6PM (Peak PM Hour). At peak construction, workers will generate 500 trips in the Peak AM Hours and 500 trips in the Peak PM Hours. In addition, the Project is expected to have 20 to 30 truck deliveries per day at the peak of construction, generating up to 60 additional one-way delivery vehicle trips per day. During operation, it is expected that activities will necessitate the presence of personnel onsite weekly.

There are no expected routine needs for oversized or overweight vehicles following construction, and Big Bronco Solar, LLC, in cooperation with construction contractors, will work with the County and Colorado Department of Transportation (CDOT) to agree upon necessary permits and maintenance needs.

During operations, it is expected that day-to-day O&M activities for the Project will necessitate the presence of one to three full-time personnel onsite. However, occasional circumstances may require up to 15 operational employees onsite, though such occurrences would be infrequent.

Access to the Project will utilize County roads. Big Bronco Solar, LLC will submit a haul route map to the County for review prior to construction. Big Bronco Solar, LLC will coordinate all County road use for the Project with the Adams County Public Works Department and will work closely with staff to minimize impacts to County roads.

If the County determines that a road use agreement is necessary for the construction phase, Big Bronco Solar, LLC will enter into an agreement to address the use of County roads. The agreement will outline responsibilities for assessing road conditions, and completing maintenance and repairs, among other County concerns, to ensure that potential impacts during Project construction are minimized and mitigated.

Big Bronco Solar, LLC received correspondence from the City of Aurora's Senior Planner on August 22, 2025, highlighting the following regarding Imboden Road from E Colfax to E 72nd Avenue:

- Imboden is currently a detour for the closures of Hudson Road and 56th Avenue, so it already has increased traffic until mid-2027. The City of Aurora jurisdiction ends at 64th Avenue. Project construction is not anticipated to overlap in time with this detour.
- Imboden is not currently a truck route, so Transport permits will be required.
- The CIP [Capital Improvement Plan] map did not show any projected or planned projects along Imboden.
- Colfax (Highway 36) is a CDOT facility, and so an evaluation of whether their traffic would trigger a new access permit will likely be required. A traffic letter documenting construction and standard operating traffic would help determine what, if anything, is needed

Big Bronco Solar, LLC will continue to work with the City of Aurora on any required permits. See submitted correspondence in **Appendix D: Referral Agency Outreach**.

3.16 Federal Aviation Administration Coordination, and Aeronautical Studies

Capitol Airspace conducted an obstruction evaluation and airspace analysis for the Project (Capitol Airspace Group 2025-A). The analysis reviewed obstacle clearance surfaces established by the Federal Aviation Administration (FAA) that could constrain placement of structures at 15, 30, and 150 feet above ground level. The study also assessed proximity to airports, published instrument procedures, enroute airways, FAA minimum vectoring and instrument flight rules altitude charts, as well as military airspace and training routes. Results indicated that structures exceeding 150 feet above ground level could penetrate certain obstacle clearance surfaces in the southern, southwestern, and eastern

portions of the study area. However, such penetrations do not automatically result in an FAA determination of hazard.

The tallest structures currently proposed for the Project are the Gen-tie transmission towers, anticipated to range from 80 to 120 feet in height. To avoid determinations of hazard, structure heights will be designed in accordance with the height constraint maps developed through the study.

Based on this approach, no FAA determinations of hazard are anticipated. Under 14 Code of Federal Regulations Part 77.9, the FAA requires notification of proposed structures that exceed specified height or proximity thresholds so that an aeronautical study can be conducted. These studies are intended to confirm that structures do not compromise the safety of air navigation or the efficient use of navigable airspace. Because Project structures are designed to remain below the FAA-identified height constraints, the Project is not expected to pose a hazard to navigable airspace. Big Bronco Solar, LLC will submit the required notifications and complete any aeronautical studies, as determined necessary by the FAA, to ensure continued compliance.

Although not required, the FAA encourages that off-airport solar projects in proximity to airports with air traffic control towers are assessed for potential ocular impact. Currently, there are no defined federal standards for acceptable ocular impact on residences or roadways. As part of the Project's due diligence, Big Bronco Solar, LLC retained Capitol Airspace Group to perform a glare analysis utilizing Forge Solar's Glare Gauge toolset to identify the potential for glare impacts resulting from the proposed Project on low-level receptors within 0.5 mile of the proposed solar area, as well as public-use airport approach paths within 5 miles of the proposed Project area (Capitol Airspace Group 2025-A). Specifically, this analysis considered the potential for glare impacts on the CASP and Denver International Airport approaches and air traffic control towers, as well as nearby roadways and residences.

Glare Gauge modeling predicted limited morning and evening glare occurrences from late September through mid-March for aircraft approaches to CASP Runway 17 and a potential future Runway 17F. The predicted glare is classified as green and yellow, occurring when the sun is below 35.7 degrees in altitude. Green glare represents a low potential for temporary after-image, which the FAA has historically deemed acceptable for pilots. Yellow glare indicates potential temporary after-image.

For low-level receptors, including nearby residences and roadways, no glare occurrences are predicted. These results apply FAA glare standards and represent a conservative assessment, as the model does not account for vegetation, fencing, or other natural screening features.

See **Appendix I: Glint and Glare Analysis**.

3.17 Conformance with Zone District Regulations and Setbacks

The current Site Plan has been designed based on the assumptions below in **Table 4**.

Table 4. Required Setbacks for Zone A-3 and Project Compliance

Regulatory Reference	Description of Setback	Applied to Project (Applicable/Not Applicable)
Setback and Dimensional Requirements for a Principal Structure		
3-10-06-03-01 Minimum Front Setback	The minimum front setback for a principal structure in an A-3 district shall be fifty (50) feet.	Applicable. Project solar, BESS, collector substation, and O&M building will be located greater than 50 feet from the front of property lines.
3-10-06-03-02 Minimum Side Corner Setback	The minimum side corner setback for a principal structure in an A-3 district shall be fifty (50) feet.	Applicable. Project solar, BESS, collector substation, and O&M building will be located greater than 50 feet from corner of property lines.
3-10-06-03-03 Minimum Side Setback	The minimum side setback for a principal structure in an A-3 district shall be ten (10) feet, or one (1) foot per two (2) feet of height, whichever is greater.	Applicable. Project solar, BESS, collector substation, and O&M building will be located greater than 35 feet from side of property lines (based on tallest proposed structure of approximately 70 feet).
3-10-06-03-04 Minimum Rear Setback	The minimum rear setback for a principal structure in an A-3 district shall be twenty (20) feet. If the rear property line fronts a public ROW where access is taken, the rear setback shall be fifty (50) feet.	Applicable. Project solar, BESS, collector substation, and O&M building will be located greater than 20 feet from rear property lines.
3-10-06-03-05 Minimum ROW Setback	The minimum setback for a principal structure in an A-3 district from an arterial ROW shall be fifty (50) feet except a section line arterial ROW where the minimum setback shall be one-hundred-twenty (120) feet. The minimum setback from a collector or local road shall be fifty (50) feet.	Applicable. Proposed solar, BESS, collector substation and O&M facilities will be located at least 120 feet from section line arterial ROWs.
3-10-06-03-06 Minimum Setback from Section Line for All Structures	The minimum setback from a section line for a principal structure or agricultural building in an A-3 district shall be one-hundred-twenty (120) feet. Variations may be permitted if the Department of Public Works determines no additional ROW is required.	Applicable. Proposed solar, BESS, collector substation and O&M facilities are located at least 120 feet from section lines. Request Waiver as plans include encroachment on section lines where there is no County ROW.

Regulatory Reference	Description of Setback	Applied to Project (Applicable/Not Applicable)
Setback and Dimensional Requirements for Accessory Structures or Agricultural Buildings		
3-10-06-04-01 Minimum Front Setback	All accessory structures shall be set back at least ten (10) feet to the rear of the front structure line of the principal dwelling, or one hundred (100) feet from the front property line, whichever is less, if a principal dwelling already exists on site. The minimum front setback for a principal structure in an A-3 District shall be fifty (50) feet.	Applicable. No principal dwellings would be located within the Project site. Accessory structures will be located at least 100 feet from the front property line.
3-10-06-04-02 Minimum Side Setback	The minimum side setback for accessory structures in an A-3 district shall be ten (10) feet, or one (1) foot per two (2) feet of height, whichever is greater.	Applicable. Accessory structures will be located greater than 10 feet (or 1 foot per 2 feet of height) from the sides of property lines.
3-10-06-04-03 Minimum Rear Setback	The minimum rear setback for accessory structures in an A-3 District shall be ten (10) feet. If the rear property line fronts a public ROW where access is taken, the rear setback shall be fifty (50) feet.	Applicable. Accessory structures will be located greater than 10 feet (or 50 feet in the case of a public ROW) from the rear property line.
3-10-06-04-04 Minimum ROW Setback	The minimum setback for all accessory structures in an A-3 District from an arterial ROW shall be fifty (50) feet except a section line arterial ROW where the minimum setback shall be one-hundred-twenty (120) feet. The minimum setback from a collector or local road shall be fifty (50) feet.	Applicable. Accessory structures will be located greater than 50 feet from an arterial ROW (or 120 feet in the case of a sectional line arterial ROW).
3-10-06-04-05 Minimum Setback from Section Line for All Accessory Structures	The minimum setback from a section line for all accessory structures in an A-3 District shall be one-hundred-twenty (120) feet. Variations may be permitted if the Department of Public Works determines no additional ROW is required.	Applicable. Accessory structures will be located greater than 120 feet from section lines.
Setback and Dimensional Requirements for Utility Substations and Transmission Lines		
4-08-02-07-04 Utility Substations (includes transmission lines)	Public utility stations or structures in residential areas shall maintain minimum setbacks in accordance with the National Electric Safety Code for electrical lines or the U.S. Department of Transportation for gas lines, be fenced, and either be screened from view or assume a residential appearance.	Applicable. Transformers, electric substations and outdoor storage yards shall be sited to minimum setbacks in accordance with the National Electric Safety Code.

Source: Adams County 2020

Acronyms: A-3 – Agricultural 3 zoning district, BESS – battery energy storage system, O&M – operations and maintenance, ROW – right-of-way

3.18 Notifications

3.18.1 Neighborhood Meeting/ Landowner Notifications

Due to the rural nature of the Project, the requirement for a neighborhood meeting was waived by the County at the Conceptual Review meeting held on May 14, 2025. While a neighborhood meeting was not required, Big Bronco Solar, LLC did conduct neighborhood outreach for the Project. Landowner outreach letters were mailed to all landowners within 2,000 feet of the Project boundary via certified mail on October 14, 2025. The letters provided background information on the Project, contact information, a location map, and solicited landowner comments and questions. The mailing list of landowners was obtained from the County Assessors database (2024). Supporting materials and information regarding the landowner notifications have been provided under **Submittal Item 11.1: Landowner Outreach Summary**.

3.18.2 Referral Agency Outreach

On October 16, 2025, Big Bronco Solar, LLC proactively contacted the following organizations and agencies that may be impacted by the Project. Information letters were distributed to the agencies below via electronic mail and provided background information on the Project, contact information, a location map, and solicited comments and questions from the representatives contacted:

- Adam's County Health Department
- Adams County Sheriff's Office
- Bennett Parks and Recreation District
- Bennett 29J School District
- Brighton 27J School District
- Deer Trail & East Adams Conservation District
- Rangeview Library District
- TransPort Metropolitan District Number 2

Big Bronco Solar, LLC also has contacted and solicited guidance from the Bennett-Watkins Fire Rescue, City of Aurora, CPW, and U.S. Fish and Wildlife Service (USFWS). Supporting materials and information regarding referral agency outreach have been provided under **Appendix D: Referral Agency Outreach**.

3.18.3 Public Hearing Notifications

In accordance with Section 2-01-06-01 of the Regulations, notifications will be sent out by the County to residents and owners of record of all real property located within a minimum of 500 feet of the Project area. The written notices will be mailed at least 15 days prior to the first public hearing date concerning the application and will include the date, time, place, and purpose of the public hearing(s).

3.18.4 Mineral Rights

Big Bronco Solar, LLC will engage in negotiations with mineral rights holders affected by the proposed Project and will enter into agreements, as appropriate, to ensure adequate access to mineral resources. Notice will be sent out to mineral owners of record 30 days prior to the date scheduled for a public hearing by certified mail, return receipt requested.

3.19 Environmental Resource Review

As a consultant for Big Bronco Solar, LLC, Tetra Tech, Inc. conducted pre-construction baseline surveys to assess the environmental conditions at the Project site as summarized in the following sections.

3.19.1 Waterbodies and Wetlands

On November 22, 2022, Tetra Tech biologists conducted a field assessment to identify wetlands and other potential Waters of the U.S. (WOTUS) within the Project Area (Tetra Tech 2022-B). The evaluation focused on identifying potential wetlands and other WOTUS features (i.e., streams, ditches, ponds) based on indicators that were observed in the field.

The following wetland and water features were mapped within the Project area during the November assessment:

Wetland WET-01: Is an approximately 0.64-acre wetland associated with Bear Gulch (ST-03), an ephemeral stream feature located in the northwest portion of the Project area. WET-01 exhibited hydrophytic vegetation and hydrologic indicators and was situated within the stream bottom of Bear Gulch. Because both WET-01 and ST-03 terminate in uplands, they are not likely to be considered jurisdictional by the U.S. Army Corps of Engineers (USACE); therefore, they are not likely to be subject to regulation under Section 404 of the Clean Water Act (CWA) (Tetra Tech 2022-B).

Waterbody WB-01: This approximately 3-acre excavated impoundment located in the northwest portion of the Project area was identified by the National Wetlands Inventory as a potential wetland. However, field observations noted that the impoundment was entirely vegetated with upland grasses and there were no signs of hydrology or an ordinary high-water mark (OHWM). These conditions suggest the feature had not held water in recent years and is not connected hydrologically to other WOTUS. WB-01 is therefore not likely to be considered jurisdictional under Section 404 of the CWA (Tetra Tech 2022-B).

Ephemeral and Intermittent streams: A total of 23 stream segments (20 ephemeral and three intermittent) were identified, generally aligned with National Hydrography Dataset (NHD) drainages or features visible in aerial imagery. Stream indicators (e.g., defined bed and bank and OHWM) ranged from very prominent to absent and ultimately terminated in cultivated fields where agricultural practices have manipulated the historic drainage patterns across the Project area. The streams appear to carry flow during high rain events. Due to lack of downstream hydrologic connectivity and lack of continuous OHWM, they are not likely to be considered jurisdictional by USACE (Tetra Tech 2022-B).

The intermittent drainage located at the western extent of the Project area is identified in the NHD as Bear Gulch. This drainage flows northwest approximately 3 miles to a confluence with the intermittent drainage of Box Elder Creek. Box Elder Creek remains an intermittent drainage that flows north approximately seven miles to the manmade Boot Lake Reservoir.

All discharges of dredged or fill material that result in permanent or temporary losses of jurisdictional WOTUS are regulated under Section 404 of the CWA. Based on preliminary findings, the wetlands and stream features identified in the Project area are not likely to be considered jurisdictional by USACE. However, only USACE can make final determinations on the status of wetlands and other WOTUS.

The Project has been sited to avoid all impacts to wetlands and other potential WOTUS. A setback of 50 feet from wetlands and 150 feet from waterbodies has been incorporated into the Project design (see **Submittal Item 4.0: Site Plan**).

In 2024, Colorado also passed House Bill (HB) 24-1379 to protect Waters of the State from dredge and fill activities. If it is determined that any regulated water resources cannot be avoided, Big Bronco Solar, LLC will coordinate with the USACE and/or Colorado Department of Public Health and Environment, Water Control Division, regarding compliance with applicable regulations, including permitting requirements under Section 404 and Section 401 of the CWA and HB 24-1379. See **Appendix E: Wetland Delineation Report** for detailed mapping and documentation.

3.19.2 Floodplains

The National Flood Hazard Layer produced by Federal Emergency Management Agency (FEMA) identifies approximately 132 acres designated as 100-year floodplains within the Project area running through the easternmost portion of the Project area (see **Appendix A: Figure 7. Water Resources in the Project Area**). FEMA defines this designation as an “area that will be inundated by the flood event having a one percent chance of being equaled or exceeded in any given year. The one percent annual chance flood is also referred to as the base flood or 100-year flood (FEMA 2025). Within the Project Area, 19 acres are designated within the 500-year floodplain.

The mapped FEMA floodplain is also designated as a Natural Resources Conservation Overlay (NRCO) District (**Appendix A: Figure 8. Natural Resources Conservation Overlay District**). All Project facilities have been sited to completely avoid any disturbance within the NRCO district boundaries and to comply with required setbacks for natural resources as outlined in the Regulations (Adams County 2020). A 50-foot buffer has been incorporated into the Project design from floodplain boundaries (see **Submittal Item 4.0: Site Plan**).

No infrastructure or surface disturbances are anticipated to be located within the NRCO or floodplain; therefore, there will be no impacts to floodplains or the NRCO district. Any fencing or equipment shown in preliminary site plans will be removed for the final layout.

3.19.3 Wildlife Habitat

A desktop review of wildlife habitat and field surveys were conducted by Tetra Tech (Tetra Tech 2023-B). A query of the USFWS Information for Planning and Consultation online tool, and the CPW All Species Activity Mapping data (CPW 2023-A) and CPW raptor nest database (CPW 2022) was conducted to obtain a list of special status species with potential to occur in suitable habitat within the Project area. Field surveys were completed on November 22, December 1, 2022, and April 25, 2023, to assess wildlife habitat within the Project Area (see **Appendix F: Wildlife Habitat Assessment**). Surveys were conducted by foot where access had been granted and by vehicle using existing public roads within the 1-mile Project buffer. Biologists documented habitat types, assessed the area for potentially suitable

habitat for federally and state-listed threatened and endangered species, and mapped species occurrences, if observed.

The Project area is composed predominately of cultivated croplands with some residential development and vegetation observed during the field visit was consistent with that of the National Land Cover Dataset for the Project (USGS 2019). Most of the land cover within the Project was composed of cultivated crops including winter wheat (*Triticum aestivum*) and corn (*Zea mays*). Drainages within the Project area were the only areas that were not cultivated, and species observed included smooth brome (*Bromus inermis*), cheatgrass (*Bromus tectorum*), western wheatgrass (*Pascopyrum smithii*), blue grama (*Bouteloua gracilis*), prairie sunflower (*Helianthus petiolaris*), cockle bur (*Xanthium strumarium*), Russian thistle (*Salsola tragus*), common mullen (*Verbascum thapsus*), and milkweed (*Asclepias spp.*). The presence of cultivated crops throughout the Project area has limited the biological diversity of the Project area. There is recently mapped CPW high priority habitat (HPH) located within the Project area. This was not flagged in previous consultations with CPW, but Big Bronco Solar, LLC can make design changes in order to accommodate this as recommended.

Based on review of available desktop data and the field survey, Tetra Tech determined there is a moderate likelihood of occurrence for monarch butterfly (*Danaus Plexippus*), burrowing owl (*Athene cunicularia*), mule deer (*Odocoileus hemionus*), and pronghorn (*Antilocapra americana*) within the Project area (Tetra Tech 2023-B). This determination is based on species range and habitat observed during the field survey, indicating there is potentially suitable habitat for these species within the Project area and 1-mile buffer.

Tetra Tech also determined there is a low likelihood of occurrence for black-tailed prairie dog (*Cynomys ludovicianus*), bald eagles (*Haliaeetus leucocephalus*), and golden eagles (*Aquila chrysaetos*) within the Project area. This determination is based on species range, habitat observed during the field survey, and observations made during the field survey, which did not identify any active black-tailed prairie dog colonies. In addition, no suitable nesting habitat for golden eagles was observed within the Project area, and the Project area contains marginal nesting habitat for bald eagles.

Tetra Tech observed five non-eagle raptor nests during the field visits on November 22, 2022, December 1, 2022, and April 25, 2023. Of the five nests identified during the raptor nest survey, one inactive nest was located within the Project area, and four of the nests were located outside the Project area but within the 1-mile buffer of the Project area (Tetra Tech 2023-B). If construction occurs within the raptor nesting season in Colorado (generally February 1 – August 31), pre-construction nest surveys will be conducted prior to planned construction activities and appropriate avoidance buffers will be implemented for active nests based on CPW's *Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors* guidance document (CPW 2020).

Tetra Tech provided Project introduction letters to USFWS and CPW on February 23, 2023, seeking feedback on the potential for special status species to occur within the Project area. USFWS responded on March 31, 2023, and had no concerns with the Project resulting in impacts to species listed as federally threatened or endangered. The agency recommended that Big Bronco Solar, LLC review the USFWS's migratory bird guidance on avoiding and minimizing incidental take (USFWS 2023).

A site visit with CPW was conducted in April 2023 and CPW's primary recommendation was to incorporate a big game movement corridor along Bear Gulch, which Big Bronco Solar, LLC has

incorporated into the Project design (CPW 2023). See **Submittal Item 4.0: Site Plan** for the proposed Project's movement corridors.

Based on coordination with CPW, and in consideration of CPW's *Best Management Practices for Solar Development* (CPW 2021), the Applicant has incorporated wildlife-friendly fencing into the Project design and may utilize native pollinator-friendly seed mixes during revegetation.

In addition, if construction occurs within the migratory bird nesting season in Colorado (April 1 to August 31), nest surveys will be conducted prior to planned construction activities and appropriate avoidance buffers will be implemented for active nests based on CPW's *Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors* guidance document (CPW 2020). This will include focused burrowing owl surveys prior to construction within prairie dog colonies and other areas of potential burrowing owl habitat within the Project area during the burrowing owl active season (March 15 to October 31).

Big Bronco Solar, LLC most recently had a project call with CPW in March 2025 (CPW 2025). The following Project specific recommendations were discussed:

- The Applicant identified the need for prairie dog exclusion fencing to prevent infrastructure damage and reduce fire risk. The proposed design includes a layer of "chicken wire" at the base to deter prairie dogs from digging.
- Pronghorn have been problematic at the Spaceport due to their tendency to crawl under fences. CPW recommended fencing that allows for pronghorn passage and avoids entrapment.
- CPW also recommended incorporating funnel-shaped ends at designated wildlife corridors to guide animal movement.
- The Applicant confirmed that the central wetland avoidance buffer will be fenced in a manner that prevents wildlife from becoming trapped. The Project will have on-site operational staff, and operations plans include strict gate management protocols to ensure wildlife can be released if necessary.
- The Applicant plans to use downward-directed lighting at the substation to minimize nighttime light pollution.
- Updated prairie dog and raptor nest surveys are planned for later in 2025 and results will be shared with CPW.

Big Bronco Solar, LLC is familiar with the CPW BMPs for Solar Development and will consider and incorporate BMPs into Project planning efforts. The Applicant will continue to coordinate with CPW as needed prior to construction to address potential impacts to sensitive wildlife species. See **Appendix D: Referral Agency Outreach**.

3.19.4 Cultural Resources

A qualified professional archaeologist from Tetra Tech conducted a site file search of the Project area and a 1-mile buffer (study area) through the Colorado Historic Society Office of Archaeology and Historical Preservation Colorado Cultural Resource Online Database (COMPASS) on November 22, 2022 (Tetra Tech 2022-A). Tetra Tech also reviewed information on Colorado Historical Landmarks and the Colorado State Register of Historic Properties, as well as historic Bureau of Land Management General Land Office records, to determine whether architectural resources, vestiges of trails, transportation

routes, homesteads, or other historic resources may be present in the Project area. In addition, Tetra Tech accessed the Housing and Urban Development Tribal Directory Assessment Tool and National Conference of State Legislatures List of Federally Recognized Tribes to identify federally identified tribes and tribes with cultural affiliation to Adams County (Tetra Tech 2022-A).

Results from the records search indicate that there are 34 previously recorded cultural resources that intersect the 1-mile buffer; however, no previously recorded cultural resources identified were located within the Project area. In addition, there are no anticipated direct or indirect Project impacts to previously recorded resources identified within the study area.

Although there are no documented eligible resources within the Project area, undocumented cultural resources may be present. A Project-specific, Unanticipated Discoveries Plan has been developed which outlines procedures for unexpected finds, human remains, and other archaeological remains. See **Appendix G: Cultural Resources Review**.

3.20 Conformance with Adams County Conditional Use Permit Criteria (2-02-09-06)

3.20.1 The conditional use is permitted in the applicable zone district. (2-02-09-06:1)

The Project is located on privately owned properties located within the A-3 zoning district and designated for agricultural use. According to the Regulations, a large-scale solar energy system, BESS, substation and transmission facilities are allowed uses permitted through a CUP. The Project's location is compatible with adjacent land uses and benefits from its proximity to the existing transmission systems, making it an ideal location for a solar energy facility. The Applicant will design and construct the facility in a manner to be compatible with the surrounding area, ensuring that areas beyond the Project boundary remain unaffected.

3.20.2 The conditional use is consistent with the purposes of these standards and regulations. (2-02-09-06:2)

The Project is consistent with the purposes of Adams County standards and regulations because it advances orderly development while protecting public health, safety, and welfare. The Project is sited to avoid conflicts with existing land uses and natural resources, while supporting the County's goals for responsible growth and renewable energy development. The Project contributes to long-term economic vitality, increases local tax revenues, and diversifies the County's energy portfolio.

Furthermore, the Project has been designed to minimize potential impacts on surrounding properties through appropriate setbacks and environmental BMPs. In doing so, the Project upholds the intent of the County's standards to balance land use compatibility, community benefits, and sustainable development.

The Project will be designed and constructed in accordance with all applicable zoning and building code requirements, the Adam's County Design Standards and Regulations, and will remain in compliance with the requirements and conditions of the CUP issued by Adams County. The Project meets the minimum lot size, setback, and height requirements.

3.20.3 Compliance with performance standards. (2-02-09-06:3)

The conditional use will comply with the requirements of these standards and regulations including, but not limited to, all applicable performance standards.

The Applicant will ensure that all design requirements and performance standards are met, as applicable under Chapter 4 of the Regulations (Adams County 2020).

3.20.3.1 Site Plan

A planning **Site Plan** has been submitted with this application under **Submittal Item 4.0**.

A Site Plan Review is required for all large-scale solar energy systems prior to building permit approval. Prior to construction, Big Bronco Solar, LLC will update the preliminary Site Plan documents to include all required information, as specified under Section 4-11-02-06-01 of the Regulations, and will submit updated plans to the County for an official Site Plan Review. The plans will include the requirements as follows:

- a. Property lines and physical features, including roads, for the project site;
- b. Proposed changes to the landscape of the site, grading, vegetation clearing and planting, exterior lighting, screening vegetation or structures;
- c. Blueprints or drawings of the solar energy system showing the proposed layout of the system, the distance between the proposed solar collector and all property lines, and the tallest finished height of the solar collector;
- d. Name, address, and contact information for proposed system installer; and
- e. Name, address, phone number and signature of the project proponent, as well as all co-proponents or property owners, if any; Lot Coverage: The area covered by ground-mounted solar energy systems, where the ground beneath is permeable or pervious, shall not be included in calculations for lot coverage for purposes of zoning.

3.20.3.2 Location

The Project is in the A-3 zoning district. All Project facilities will be designed and located in conformance with the A-3 zoning district regulations and setbacks, as demonstrated in **Table 4**.

3.20.3.3 Maximum Height

At a maximum tilt, the solar arrays will not exceed 20 feet in height, as measured from the highest grade below each solar panel. Panels will be arranged in arrays with a north-to-south orientation.

3.20.3.4 Signage

The Applicant will ensure that clearly visible warning signs are placed on the fence, barrier, or facility perimeter to inform individuals of potential voltage hazards. No commercial signage will be installed at the site.

3.20.3.5 Security

The Project facility will be enclosed by a 7-foot-tall wildlife friendly (e.g., no top barbed wire) chain-link fence around the perimeter of the Project area, and in accordance with minimum setback

requirements. Additional security fencing will enclose the Project substation and BESS facilities within the Project area. The Applicant will take proactive measures to regularly monitor the enclosed facility during operations to reduce the risk of unintended wildlife entrapment. CPW recommends frequent monitoring of the Project area to document any wildlife mortalities and submitting an annual mortality report.

Fencing materials and design will observe National Electric Safety Code requirements and consider recommendations from CPW's guidance to the greatest extent practicable to minimize risks to wildlife (CPW 2009). Access to the site will be limited to secured entrance gates. Only operations personnel and other owner-approved parties will have access to the site.

3.20.3.6 Landscape Requirements

Due to the location of the facility, absence of adjacent residences or businesses, and lack of water district service needs, any Landscape Screening requirements determined through the permitting process will be addressed on a case by case basis.

However, to guide revegetation efforts and minimize wildfire risk at the site, a **Preliminary Noxious Weed and Vegetation Management Plan** has been developed and is included in **Appendix B**. This plan outlines the following activities:

- Procedures for reclaiming and revegetating disturbed sections of the site;
- Construction BMPs;
- Suitable weed control measures to be implemented throughout the Project's construction, operation, and maintenance phases;
- Vegetation control and management methods (i.e. mowing schedules, grazing) to protect for minimizing fire risk at the site, in accordance with the adopted fire code.

A low-growing native seed mix will be used to revegetate areas disturbed during construction. The Applicant will carefully manage the vegetation at the Project facility. Monitoring and controlling noxious weeds and undesirable plant species will be critical to maintaining healthy vegetation onsite.

3.20.3.7 Fire Code

The Project will be designed and constructed to meet all requirements of the currently adopted fire code. The Applicant will coordinate with the Bennett Fire Protection District prior to construction and incorporate their feedback into the final Project design.

Vegetation management within the Project site will prioritize fuels breaks, fuel reduction, the establishment of native species, and the control of non-native and invasive species. These will reduce the wildfire risk associated with the Project. A **Preliminary Noxious Weed and Vegetation Management Plan (Appendix B)** specific to the site has been developed outlining the measures and BMPs that will be followed to maintain minimum levels of vegetation on the perimeter of the facility. A 10-foot area free of brush will be maintained around the solar arrays, and a graveled area will be maintained around the substation and BESS for fire safety. The Preliminary Noxious Weed and Vegetation Management Plan will comply with applicable fire regulations adopted by the Bennett Fire Protection District.

A Fire Management Plan will be included as part of the **Emergency Response Plan (Appendix J)** to reduce the risk of fire from Project construction and operation. Coordination with the Bennett Fire Protection District is currently underway. Big Bronco Solar, LLC will work closely with the Fire Protection District to develop the Plan, which will be reviewed for Project activities and efforts to reduce the risk of wildfire.

3.20.3.8 Lighting

Motion-activated lighting will be limited to the substation, BESS, and O&M facility and will be designed to meet code requirements, while providing the necessary illumination for safety and security. Project lighting will be downward-facing and shielded to focus illumination on specific areas. If illumination is needed at the main access gate, it will be implemented accordingly.

3.20.3.9 Stormwater/Erosion Mitigation Plans

Adams County and FEMA mapping show that a regulated 100-year floodplain overlaps the western portion of the Project area. The National Flood Hazard Layer produced by FEMA identifies approximately 307 acres designated as 100-year floodplains within the study area primarily along the Bear Gulch drainage. These areas will be avoided in the final site layout of Project infrastructure, fencing, and preliminary grading as shown on the **Site Plan (Submittal Item 4.0)**. If any proposed improvements are identified within the floodplain, a Floodplain Use Permit will be obtained by the Applicant.

The Project site is not within an Adams County Multiple Separate Storm Sewer Systems Permit area, and a stormwater quality permit is not required from the County. All erosion and sediment control will be achieved through the application of BMPs, and the Applicant's EPC contractor will be responsible for adhering to all regulations of Adams County Ordinance 11 regarding illicit discharge.

A Stormwater and Erosion Mitigation Plan will be submitted to the County prior to construction, which will also be required by the Colorado Department of Public Health and Environment as part of the Project's General Construction Permit (COR400000). The Plan will outline the BMPs used to prevent or contain erosion under the solar panel drip line and to manage stormwater runoff. Big Bronco Solar, LLC will be responsible for installation and maintenance of erosion and sediment control BMPs and ensuring that its contractor adheres to County regulations regarding discharges.

A **Preliminary Storm Drainage Study (Submittal Item 11.2)** has been completed for the Project per correspondence with the County, in accordance with Chapter 9 of the Adams County Development Review Manual and incorporated into the **Site Plan** under **Submittal Item 4.0**.

Prior to construction and issuance of building permits, Big Bronco Solar, LLC will submit a final Grading Plan, Drainage Report, and Drainage Plans in accordance to Chapter 9 of the Adams County Development Standards for review and final approval. A Colorado Urban Hydrograph Procedure will be completed as part of the final plans. Big Bronco Solar, LLC will also coordinate with the Mile High Flood District regarding completion of the Crooked Run Master Drainage Plan and determine any specific required improvements.

3.20.3.10 Wildlife Corridors

The Project site is primarily composed of cultivated cropland under active production, which supports limited wildlife habitat; therefore, minimal impacts to sensitive natural resources are anticipated.

Project facilities have been carefully sited within the property to avoid wetlands and waterbodies, floodplains, and to minimize impacts to areas that might provide wildlife habitat. Big Bronco Solar, LLC has completed a suite of environmental studies for the site, and the results have been incorporated into the Project design (see **Appendix E: Wetland Delineation Report** and **Appendix F: Wildlife Habitat Assessment**). In addition, Big Bronco Solar, LLC consulted with CPW to obtain recommendations and feedback on the ecological functions of the site (**Appendix D: Referral Agency Outreach**). Factors considered during this process included habitat value and connectivity, natural features, wildlife movement patterns, and site design requirements. CPW's primary recommendation was to establish a wildlife movement corridor along Bear Gulch, which has been incorporated into the Project design (see **Submittal Item 4.0: Site Plan**). Additional wildlife corridors within the Project area will further minimize and mitigate potential barriers to wildlife movement that could otherwise result from development and construction of a large-scale solar facility.

3.20.3.11 Decommissioning

Appendix C: Preliminary Decommissioning Plan outlines the process and procedures for decommissioning the Project in accordance with Section 4-10-02-06-01 (11[a-c]) of the Regulations. Decommissioning will be done in a manner to ensure the safe, efficient, and environmentally responsible removal of Project facilities at the end of the Project's operational life and will ensure that the property is reasonably restored and stabilized. All decommissioning activities will be conducted in accordance with applicable local, state, and federal regulations.

3.20.4 Compatibility with Surrounding Area. (2-02-09-06:4)

The Project has been carefully sited and designed to ensure compatibility with surrounding land uses, which are primarily agricultural in nature. The Project will coexist harmoniously with existing land uses while offering economic and environmental benefits to the local communities and the County.

The proposed Project is approximately 2,800 acres, which classifies it as a large-scale solar system. Such facilities, along with BESS, substations and transmission lines are expressly allowed within the A-3 zoning district pursuant to approval of a CUP. The site is bordered by A-3, I-1, and aviation (Aurora and AV) zoning, with approximately 18 rural residences located within 1-mile of the Project. CASP lies directly south of the Project area, while Denver International Airport is approximately 3.3 miles east. The nearest non-participating residence is located approximately 675 feet (0.125-miles) from the nearest Project facility (Parcel 0181702200002). There are six community scale solar projects and a high voltage substation within 1.5 miles of the Project.

The Project falls within the CASP subarea Plan (see **Appendix A: Figure 11. Colorado Air and Space Port Subarea Plan Map and Figure 12. Airport Influence Zones**), which includes a mix of future land use designations including Green Energy and Sustainable Agriculture, Industry Hub, and Aerospace and Innovation. Renewable energy would be a suitable use at this location.

The Project is consistent with applicable airport-related overlay districts and restrictions. The Project area is located within the Airport Height Overlay (AHO), Airport Influence Zone (AIZ), and Airport Noise Overlay (ANO) associated with the CASP (formerly Front Range Airport). It is also intersected by designated Restriction Areas. The following design measures ensure compatibility with the applicable special districts and/or restrictions:

- **AHO:** Project facilities have been sited and designed to comply with FAA obstruction standards. The tallest structures (gen-tie transmission towers) are anticipated to range from 80 to 120 feet above ground level and remain within the height constraints identified in the Capitol Airspace obstruction evaluation. Big Bronco Solar, LLC will file all required FAA Form 7460-1 notifications and complete any aeronautical studies as determined necessary by the FAA. If any hazards are identified, the Applicant will work with the FAA to revise the Site design to ensure there are no hazards to navigable airspace and would also install and maintain any FAA-specified marking or lighting.
- **AIZ:** The AIZ includes all land impacted by the location of the CASP and the noise created by low-flying aircraft, which restricts certain residential and commercial developments. The AIZ also contains two Restriction Areas, which further limit land use within the overlay zone district. The Project does not include residential or commercial developments that are restricted under AIZ requirements. Preliminary outreach has been initiated with the CASP, and the Applicant will coordinate final design plans with the FAA and CASP to ensure compatibility with current and future airport operations.
 - **Restriction Area 1:** The southern end of the Project is transected by Restriction Area 1, which prohibits structures designed for full or part-time residential, commercial, institutional, or industrial occupation (see **Appendix A: Figure 11. Colorado Air and Space Port Subarea Plan Map and Figure 12. Airport Influence Zones**). As occupied structures are not allowed in Restriction Area 1, solar development (i.e. renewable energy development) would be a suitable use at this location. The O&M building, or any other Project facilities that may serve as office space or on-site meeting/occupation areas have been sited outside of Restriction Area 1 (see **Submittal Item 4.0: Site Plan**).
 - **Restriction Area 2:** A portion of the southeast Project area is transected by Restriction Area 2, which prohibits the construction of residences. Because the Project is a solar energy facility and does not propose any residential construction, it is therefore compatible, and this restriction does not apply.
- **ANO:** The ANO includes all land heavily impacted by the noise created by low-flying aircraft and lying within the sixty (60) day-night average sound level or greater noise contour area. If Project facilities devoted to office space or operational facilities would be constructed that fall under ANO requirements, noise reduction plans certified by a professional engineer will be provided with building permit applications, and the Aircraft Activity Covenant with Disclosure will be executed as required.

During construction, there will be a temporary increase in traffic along County Road 25 North (Imboden Road), which may impact residents in the area. However, construction activities will be short-term (20 months). During long-term operations, only monitoring and maintenance personnel will routinely visit the Project facility. Operational activities will occur during normal daytime working hours. Panel washings may occur biannually. Occasionally, emergency repairs may be required and could occur outside of normal business hours but those would be infrequent and temporary.

During operations, the Applicant anticipates a peak of 15 employees could be onsite under occasional circumstances. While the TGA used a daily trip estimate based on a conservative, worst-case scenario, most day-to-day operations will require one to three employees. It is estimated that the total routine vehicle trips per day for the Project could be six. Given the low number of routine operational trips generated, impacts to the local traffic network will be negligible. A **TGA** has been prepared for the Project and included under **Submittal Item 10.0**.

During the construction phase, the construction contractor will utilize appropriate dust control measures to minimize fugitive dust, primarily through the application of clean water, using water trucks. Post-construction, disturbed areas will be revegetated with native grass species, including under the solar arrays. Noxious weeds will be controlled in accordance with **Appendix B: Preliminary Noxious Weed and Vegetation Management Plan**. This comprehensive approach will mitigate fugitive dust generation and soil erosion risks throughout the Project's operation. The use of native species also aligns with sustainability initiatives set forth by Big Bronco Solar, LLC and Adams County. In addition, the Preliminary Noxious Weed and Vegetation Management Plan includes measures to ensure the proper maintenance of onsite vegetation and to minimize fire hazards.

The PV modules are designed to absorb light for the generation of electricity; thus, the large-scale solar energy facility is not expected to create or pose threats related to glare (see **Appendix I: Glint and Glare Analysis**).

In addition, PV, Gen-tie, substation, and BESS facilities do not generate dust, noise, fumes, smoke, odors, or other nuisances typically associated with traditional energy generation facilities.

The Project will not contribute to light pollution because there will be limited motion-activated lighting during nighttime hours. The BESS, collector substation, and O&M building (and its access points) will have lighting capabilities in case emergency nighttime maintenance is required. However, under normal conditions these facilities will not be illuminated during nighttime hours.

Adams County Development Standard 4-16-03 establishes a maximum daytime (7am to 10pm) noise level limit of 80 decibels A weighted (dB[A]) and a maximum nighttime (10pm to 7am) noise level limit of 75 dB(A) measured at the property line in agricultural zones. Unmitigated hourly equivalent operational noise levels are estimated to be as follows:

- Sound levels for typical PV inverters are approximately 80 to 85 dB(A) at 1 meter from each PV inverter. All inverters in the Site Plan are a minimum of 120 feet from property lines, with noise attenuating to 40 to 45 dB(A), therefore PV inverters would comply with the standard.
- The BESS will be in the northwest portion of the Project area adjacent to the Project substation. Tonal sound levels for battery storage are approximately 70 to 92 dB(A) at 1 meter from each BESS unit due to fans and cooling systems. The BESS is located a minimum of 200 feet from property lines with noise attenuating to up to 62 dB(A).

Therefore, operational noise levels are anticipated to remain below maximum permissible County noise levels at the property line. Furthermore, the distance of approximately 0.25 miles to East 72nd Avenue Road (the nearest public ROW) and 0.125 miles to the nearest non-participating residence reduces noise to a negligible level. Noise mitigation is not currently anticipated.

In sum, the conditional use will not result in excessive traffic generation, vibration, dust, glare, heat, smoke, fumes, gas, odors, night lighting, or nighttime hours of operation. With appropriate setbacks, design requirements and performance standards, and BMPs, the Project will operate in a manner that maintains compatibility with adjacent agricultural, residential, and aviation uses while contributing to the County's renewable energy goals. Following decommissioning and reclamation of the Project, the property could be utilized for agricultural purposes again.

3.20.5 Off-site impacts (2-02-09-06:5)

The Project will not produce significant off-site impacts. During normal operations, the facility will not produce any pollution, glare, emissions, or heavy traffic. Off-site impacts during the construction phase primarily will be due to construction traffic, which will last up to 20 months, depending on procurement of permits and final construction plans. During peak construction periods, up to 400 personnel will be onsite during working hours. Big Bronco Solar, LLC will require the construction contractor to route traffic in agreement with the County and in a manner that will minimize disturbance to typical traffic patterns. Dust control measures will be implemented, including the use of water trucks that will spray the site and applicable roads.

A **TGA** has been completed for the Project and is provided under **Submittal Item 10.0**. Traffic will increase for a short period of time during the construction phase. However, these impacts will be short-term and temporary. During operations, it is estimated that one to three O&M personnel will be onsite daily. The facility will generate approximately six vehicle trips per day (Tetra Tech 2025).

Big Bronco Solar, LLC has been coordinating with the Adams County Public Works Department to discuss potential impacts to County roads during the Project's construction phase. If the County determines that a road use agreement is necessary for the Project's construction phase, Big Bronco Solar, LLC will enter into an agreement to address Project use, maintenance, and repair of County roads. The Plan will outline responsibilities for assessing road conditions and completing maintenance and repairs to ensure that potential impacts related to Project use along Imboden Road during construction are mitigated. It is not anticipated that a road use agreement will be necessary during the Project's operational phase due to the minimal increase in traffic volume.

The Applicant has completed an *Obstruction Evaluation & Airspace Analysis* (Capitol Airspace Group 2025-B) and the Project is not anticipated to pose risks to regional aviation operations or air space. The Applicant will coordinate on final design plans with the FAA and CASP to ensure compatibility with current and future airport operations.

While having very little off-site impacts or effects within the County (see CUP Criteria 4 above), the Project will provide numerous economic benefits to the County and local communities over the course of construction and operations. During the construction phase, the Applicant anticipates a peak workforce of up to 400 temporary workers, many of which would be anticipated to be hired locally and regionally. For the operation of the Project, one to three full-time employees are anticipated to be on-site to maintain the property and facility.

Tax benefits to the State of Colorado, Adams County, and special districts will come in the form of sales and property taxes. A one-time payment based on the capital of the Project to the state, County, and district has been approximated and presented in **Table 5** below.

Anticipated property tax payments to Adams County during the 40-year lifespan of the Project are present in **Table 5** below. Given the current tax laws, the Applicant expects to pay approximately \$39+ million in property taxes to Adams County over the life of the Project. Tax revenue payments to support the Brighton 27J and Bennet 29J School Districts, Bennett Park and Recreation District, Rangeview Library District, East Adams Conservation District, TransPort Metropolitan District Number 2, and Bennett Fire Protection District, provide a significant boost as well. See **Appendix A: Figure 9 Special Districts in the Project Area**, near the Project. Tax revenue payments from the Project will support local schools and other special districts. Big Bronco Solar, LLC anticipates investing between \$400-\$500 million to construct the Project, which may vary depending on the final size and design. In addition to substantial local spending during the construction period, the direct fiscal benefit in Adams County from annual operations over the initial 40-year life of the facility is anticipated to include almost \$39+ million in property tax payments. As currently structured, the Project does not require services from the aforementioned agencies and does not affect their functionality.

Table 5. Estimated One-Time Tax Payments to Adams County from the Project

Sales and Use Tax Beneficiary	Tax Amount
State of Colorado	\$7,506,070
Adams County	\$1,941,225
Scientific and Cultural Facilities District	\$258,830
Total	\$9,706,125

Source: Internal LSbp projections based on 300MWac PV/300MWac BESS (4hr) and dependent on BESS being included in Project

3.20.6 Site Suitability. (2-02-09-06:6)

A suite of environmental studies and surveys has been completed for the Project site. A site investigation was conducted to identify the presence of wetlands, and habitat for threatened, endangered, and sensitive wildlife species. See **Appendix E: Wetland Delineation Report** and **Appendix F: Wildlife Habitat Assessment**. A cultural desktop review was completed to identify any previously recorded cultural resources. See **Appendix G: Cultural Resources Review**.

The proposed facilities have been sited to avoid impacts to wetlands and other WOTUS. In the event that regulated water resources cannot be avoided, the Applicant will coordinate with the State of Colorado and/or USACE regarding compliance with applicable regulations, including permitting requirements under Section 404 and Section 401 of the CWA. The results of the wetlands investigations are documented in **Appendix E: Wetland Delineation Report**.

Land within the site has already been modified by historic agricultural use. The proposed facilities have been sited to avoid impacts to wetlands and other WOTUS. Several of the subject parcels are transected by the NRCO, which aligns with the 100-year floodplain. The final site layout including fencing will avoid all NRCO zoned areas as shown on the Site Plan. (see **Submittal Item 4.0: Site Plan**).

No federally listed species, USFWS-designated critical habitats are present or adjacent to the Project site. There is recently mapped CPW high priority habitat (HPH) located within the Project area. This was

not flagged in previous consultations with CPW, but Big Bronco Solar, LLC can make design changes in order to accommodate this as recommended.

The Project may increase soil productivity and preserve long-term agricultural potential by reducing the intensity of land disturbance and allowing soil resources to rest and recover over the life of the Project. Once constructed, the Project would involve limited disturbance and very little soil compaction compared to traditional development, leaving much of the soil profile intact. Vegetative ground cover, comprised of native and/or pollinator-friendly seed mixes, would be established beneath and around the solar arrays. This cover would reduce soil erosion, improve soil structure, increase organic matter, and enhance water infiltration. Over time, these conditions may allow the soils to rebuild nutrients and microbial activity, restoring fertility that may have been depleted by prior agricultural use. Following decommissioning, the land can be returned to farming with improved soil health, greater moisture retention, and enhanced biodiversity.

If construction occurs during the migratory bird nesting season, the Applicant will adhere to BMPs to minimize impacts to migratory birds and raptors. Nest surveys will be conducted prior to planned construction activities during the breeding season (in Colorado April 1 to August 31), and appropriate avoidance buffers will be implemented for active nests based on CPW's *Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors* guidance document (CPW 2020).

The Applicant is working with CPW and has incorporated a significant wildlife corridor into the larger Project design along Bear Gulch based on CPW's request. The Applicant will continue to coordinate with CPW as needed prior to construction to address and minimize potential impacts to wildlife species of conservation concern.

Overall, due to the lack of significant or unique wildlife habitat within the site and implementation of the proposed mitigation measures, development and use of the site for a large-scale solar energy facility will not be expected to result in any significant conflicts with federal or state listed species, state species of conservation concern, other wildlife species, or their habitats. The results of the biological survey are documented in **Appendix F: Wildlife Habitat Assessment**.

As a consultant for the Applicant, a qualified professional archaeologist from Tetra Tech, Inc. conducted the site file search through the Colorado Cultural Resource Online Database (COMPASS) on November 22, 2022 (Tetra Tech 220-A). This database includes records of previously completed archaeological investigations and cultural resources (prehistoric and historic archaeological sites) that have been previously recorded within the Research Area. No cultural resources were identified within the Project area, and no previously recorded resources within the study area are anticipated to be impacted by Project development (see **Appendix G: Cultural Resources Review**).

Based on the site reconnaissance on December 1, 2022, environmental regulatory database search report provided by Environmental Data Resources, Inc. on November 28, 2022, and review of historical topographic maps and aerial photographs, no Recognized Environmental Conditions were identified for the Subject Property.

A **Phase I Environmental Site Assessment (ESA) (Appendix H)** was conducted for the Project site by Tetra Tec, Inc. The Phase I ESA did not identify any recognized environmental conditions (RECs), historical RECs, and/or controlled RECs within the Project area (Tetra Tech 2023-A).

The Applicant has considered the environment and sensitive resources during siting and planning for the large-scale solar energy facility and is working closely with regulatory agencies and other stakeholders to ensure that the facility is developed in a manner that minimizes impacts on environmental and local resources.

3.20.7 Functionality (2-02-09-06:7)

A **Site Plan** for the Project is included under **Submittal Item 4.0**. The Site Plan has been developed to maximize energy output while applying the most efficient and economic use of the Project site and to minimize surface disturbance to the greatest extent practicable.

The Project will not require formal parking areas. Big Bronco Solar, LLC specifically designed the solar facilities to maximize the available flat land located on the Project site, including the provision of unpaved internal roads that provide access for operation and maintenance. A wooden or wildlife friendly fence will be installed around the Project at approximately 7 feet in height.

To minimize dust generation and weed establishment and spread, the Project site will be revegetated following construction using a native seed mix. No additional landscape treatment is proposed, which will be in keeping with the existing character of the area.

There are 14 closed, three abandoned, and two active oil and gas facilities, and five closed pits on the subject parcels and numerous other active, abandoned, and closed facilities on the surrounding parcels (CECMC 2024). All oil and gas wells and associated access setbacks have been delineated on the Site Plan.

The Site Plan shows the locations of all structures, proposed structures, components, water wells, linear distances between components, and setback distances.

3.20.8 Services (2-02-09-06:8)

Access to the site will utilize the County Road system, specifically 56th Avenue and Imboden Road (County Road 25 North). However, due to the short-term duration of construction in one location, impacts to County roads are not expected. Big Bronco Solar, LLC will work with Adams County to maintain or repair any rutting or other damage to roadways resulting from construction of the Project and will work with the County to restore the road to its original condition.

If the County determines that a County Road use agreement is necessary for the Project's construction phase, Big Bronco Solar, LLC will enter into an agreement to address use of county roads. The agreement will outline responsibilities for assessing road conditions and completing maintenance and repairs, among other County concerns, to ensure that potential impacts related to Project use along roadways during construction are mitigated. Road use during operations will be minimal.

The Project will adhere to all applicable setback requirements from 72nd Avenue (north of Project Site), 56th Avenue (south of Project Site), Imboden Road (west of Project Site), and Manila Road (east of Project Site) and will meet or exceed all setback footages.

Law enforcement services for the Project area are provided by Adam's County Sheriff's Office. Fire Protection is provided by Bennett Fire Protection District. Due to the temporary duration of

construction and minimal operational staffing requirements, neither construction nor long-term operations activities for the Project are anticipated to result in an increase in the level of need for emergency response provider services. The Project will not result in changes to, or an increased need for, education or health services in Adams County.

The Project may require an onsite water supply. Potable water will be brought to the site during the construction and operations phases of the Project. Water for dust control during construction and operations (O&M building) will come from a combination of permitted off-site resources that will be trucked in as needed. The Project is not dependent on onsite sources and can proceed with water provided through commercial sources.

It is expected that natural rain and snow will provide for much of the solar panel washing during the operational phase of the Project. If additional solar panel washing by maintenance personnel is needed to ensure optimal power generation, water will likely be obtained through a commercial vendor that will deliver water to the site by truck.

Big Bronco Solar, LLC will lease the Project land and will work closely with the Division of Water Resources and all interested parties to complete any change of use authorization(s) of existing water rights or well permits. Until the Project commences construction, the current owners and well permit holders intend to continue using the wells beneficially for ongoing agricultural and residential purposes. Big Bronco Solar, LLC is open to a Condition of Approval that any applications needed for well permit conversions to secure water for the Project will be filed prior to construction.

Permanent sanitary facilities and a septic system may be required for facility operations. If a septic system is needed, the Applicant will obtain an On-Site Wastewater Treatment System Permit from the Adams County Health Department (**Submittal Item 6.0: Proof of Water and Sewer**). Portable sanitary facilities will be provided during construction of the Project. Electricity for the O&M building and other auxiliary power needs will be provided by the local utility provider (**Submittal Item 7.0: Proof of Utilities**).

The Project will be built mostly on the existing ground surface and site grading will be minimized to the greatest extent practicable, thus reducing the potential for dust generation. The site grading will also be designed to preserve the pre-development drainage pattern as much as possible, although drainage patterns previously have been modified by historic agricultural use of the properties. No significant changes to the drainage patterns are anticipated and no paved (impervious) access roads are proposed. The Applicant has incorporated a Level 1 **Storm Drainage Study (Submittal Item 11.2)** to assess the potential risks of flooding, erosion, and impacts to water quality. A Stormwater Drainage Plan and a Construction Stormwater Discharge Permit will be obtained for the site and provided to the County prior to construction.

Vegetation on the site will be restored to low growing native grasses and forbs to increase biodiversity. A 10-foot area free of brush will be maintained around the arrays and a graveled area will be maintained around the substation and BESS for fire safety. The **Preliminary Noxious Weed and Vegetation Management Plan (Appendix B)** demonstrates how the Project will be maintained in a condition that complies with applicable fire regulations adopted by the Bennett Fire Protection District.

4.0 Site Plan

lightsource bp

BASIC DESIGN

Big Bronco Solar PV Plant (435.15MWp)

Location: Adams County, CO- US

Lightsource Renewable Energy

Version 1

Lightsource BP, advancing solar



Task and objective

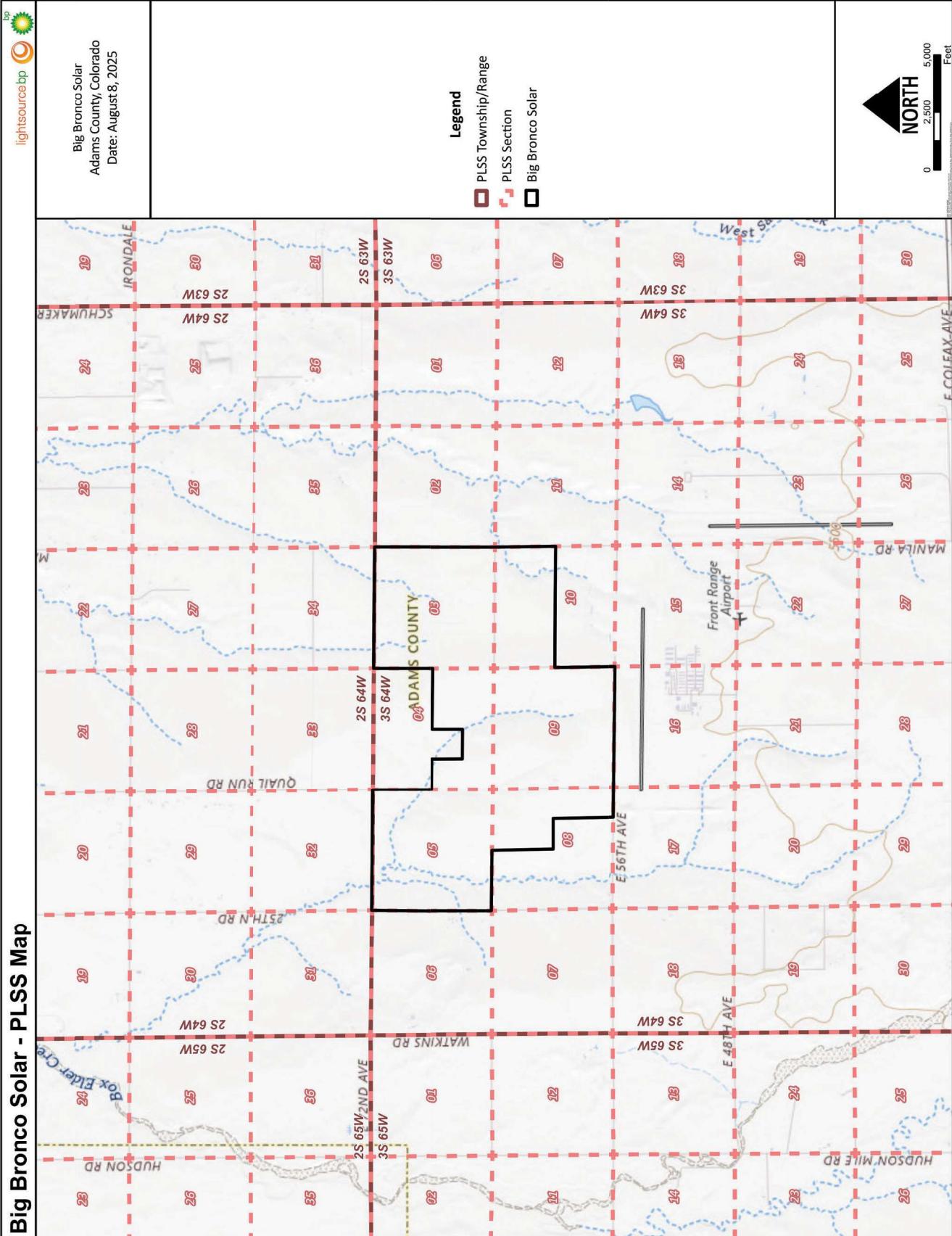
The main purpose of this document is to be used as a first step and guideline for the detailed engineering needed for the facility construction, including permitting process.

The contents of this document and information provided within it do not relieve the Contractor from the ultimate responsibility of complete and timely delivery of the Works, in compliance with all approvals, Applicable Laws, Applicable Standards and Prudent Industry Practice.

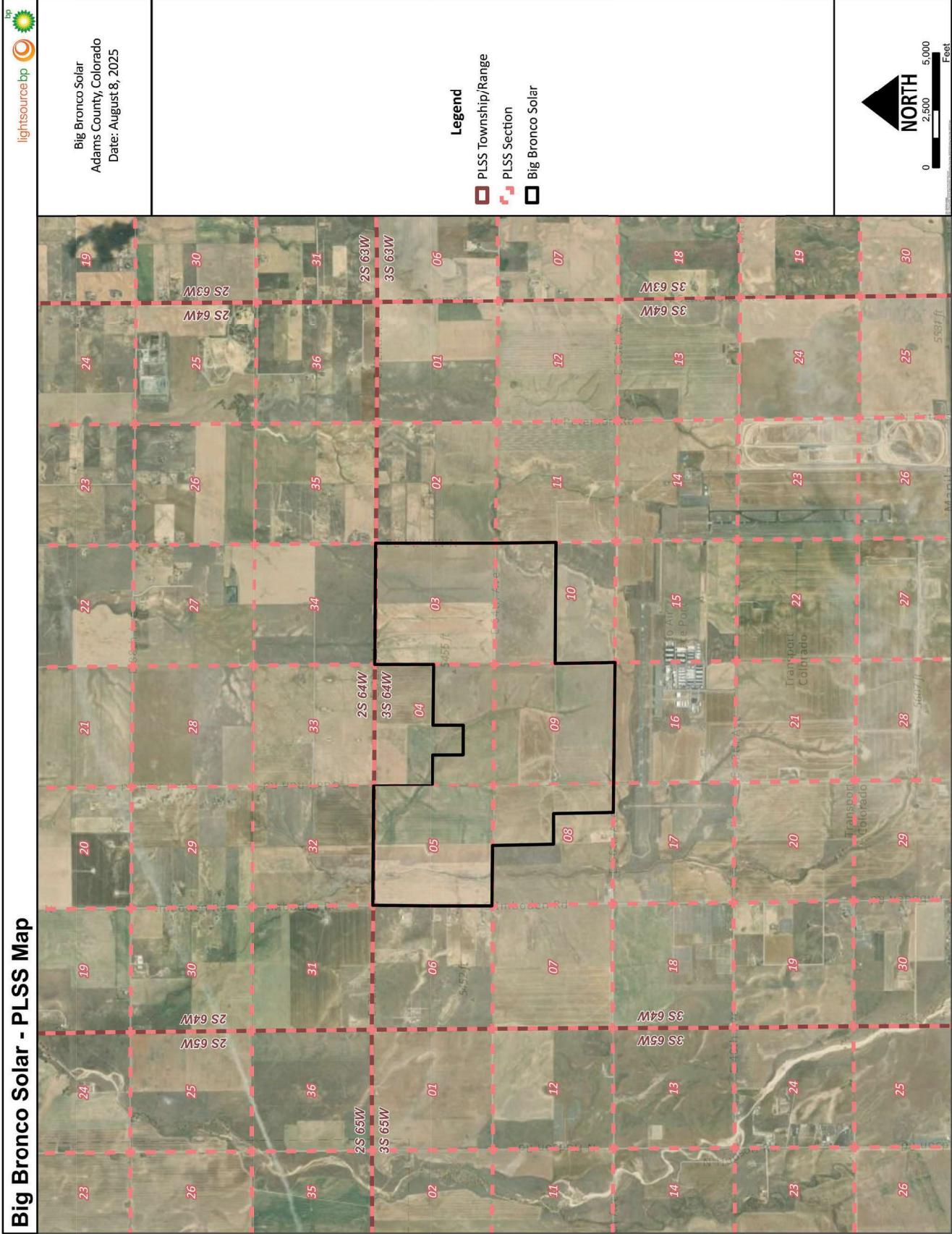
DOCUMENTATION

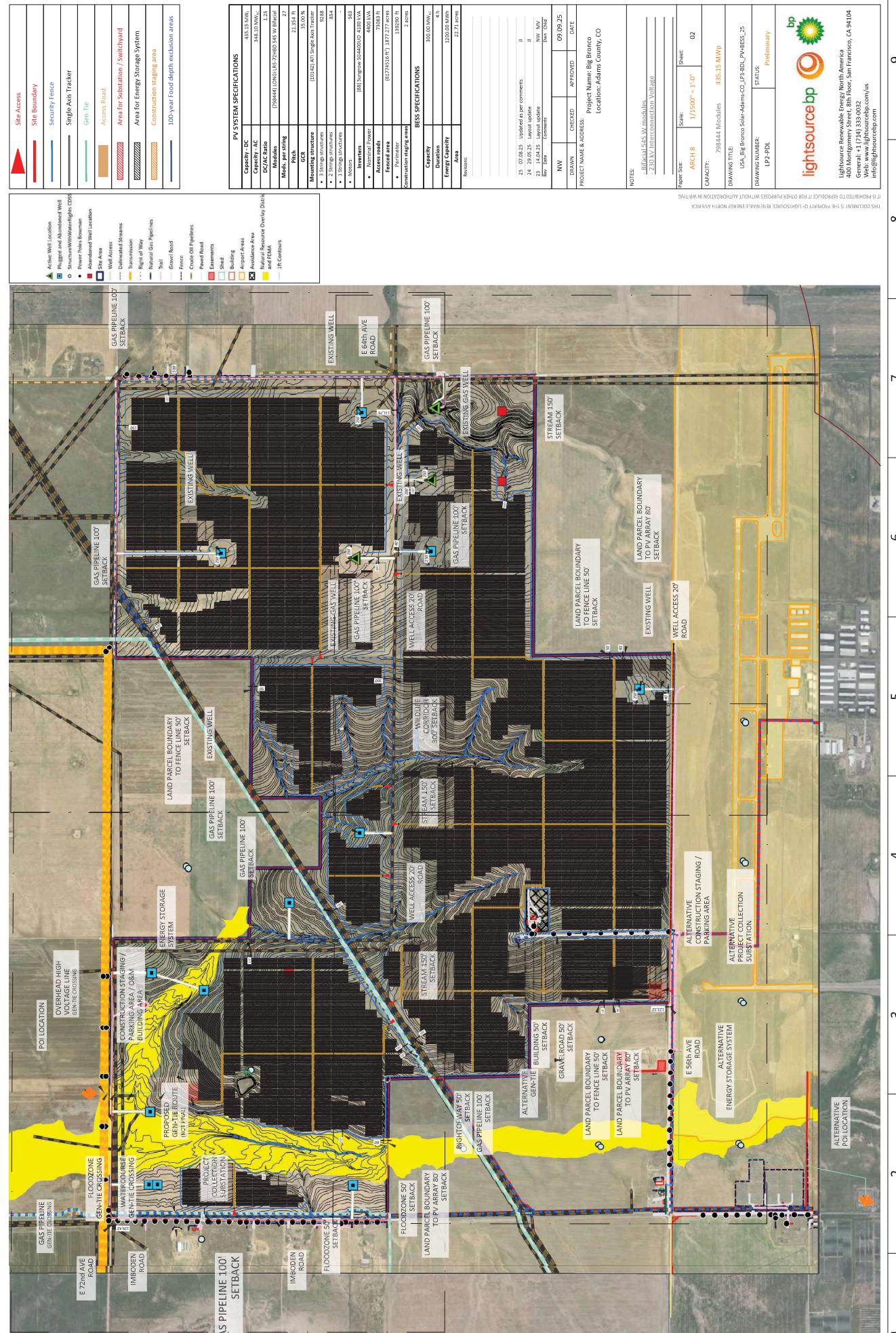
1. PV Plant Layout
2. Constraints Layout
3. Crossing details
4. Typical Solar access road
5. Typical inverter skid grading detail
6. BESS pad detail
7. Typical Solar access road
8. Fence detail
9. HV SS Foundation Detail

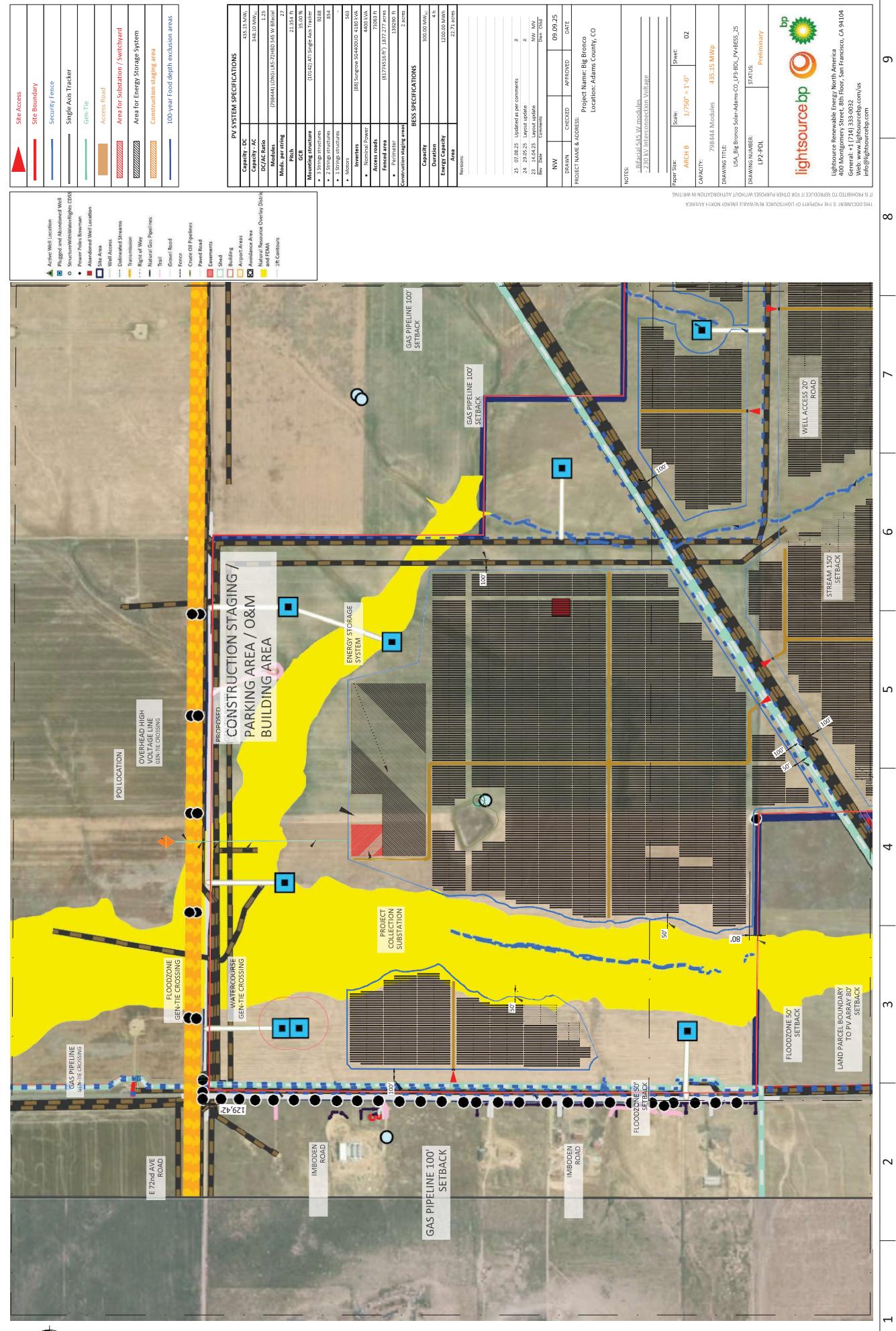
Big Bronco Solar - PLSS Map

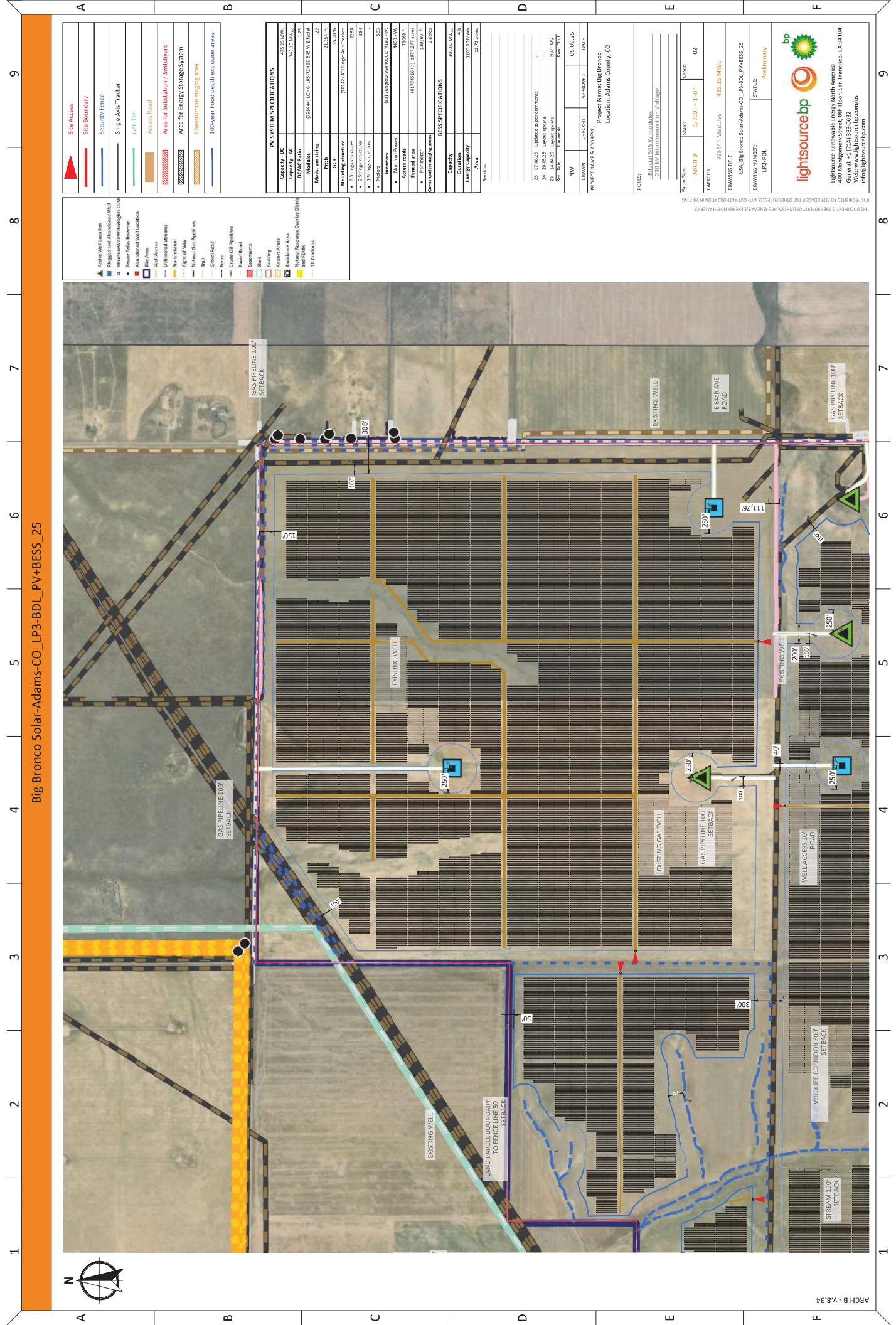


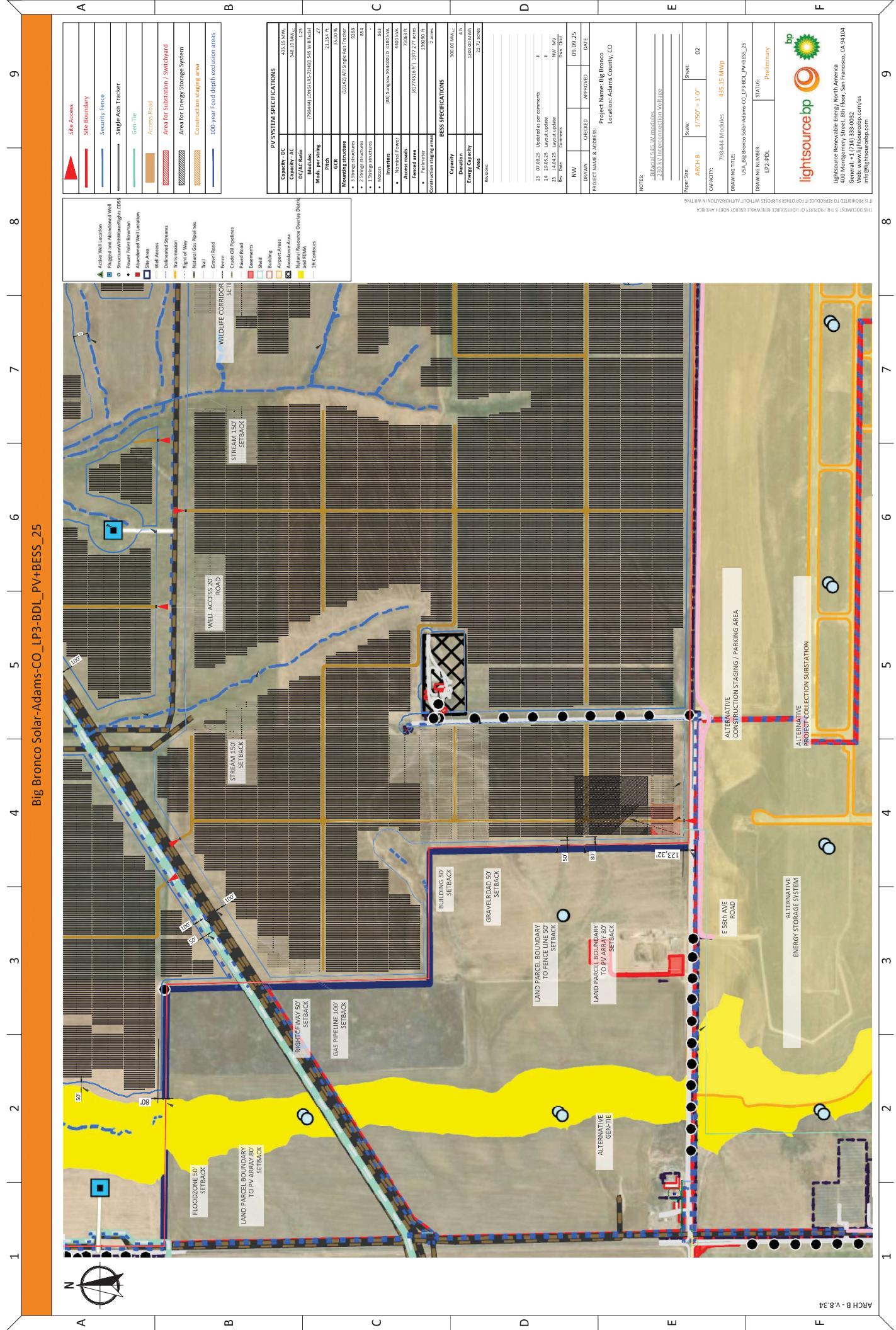
Big Bronco Solar - PLSS Map

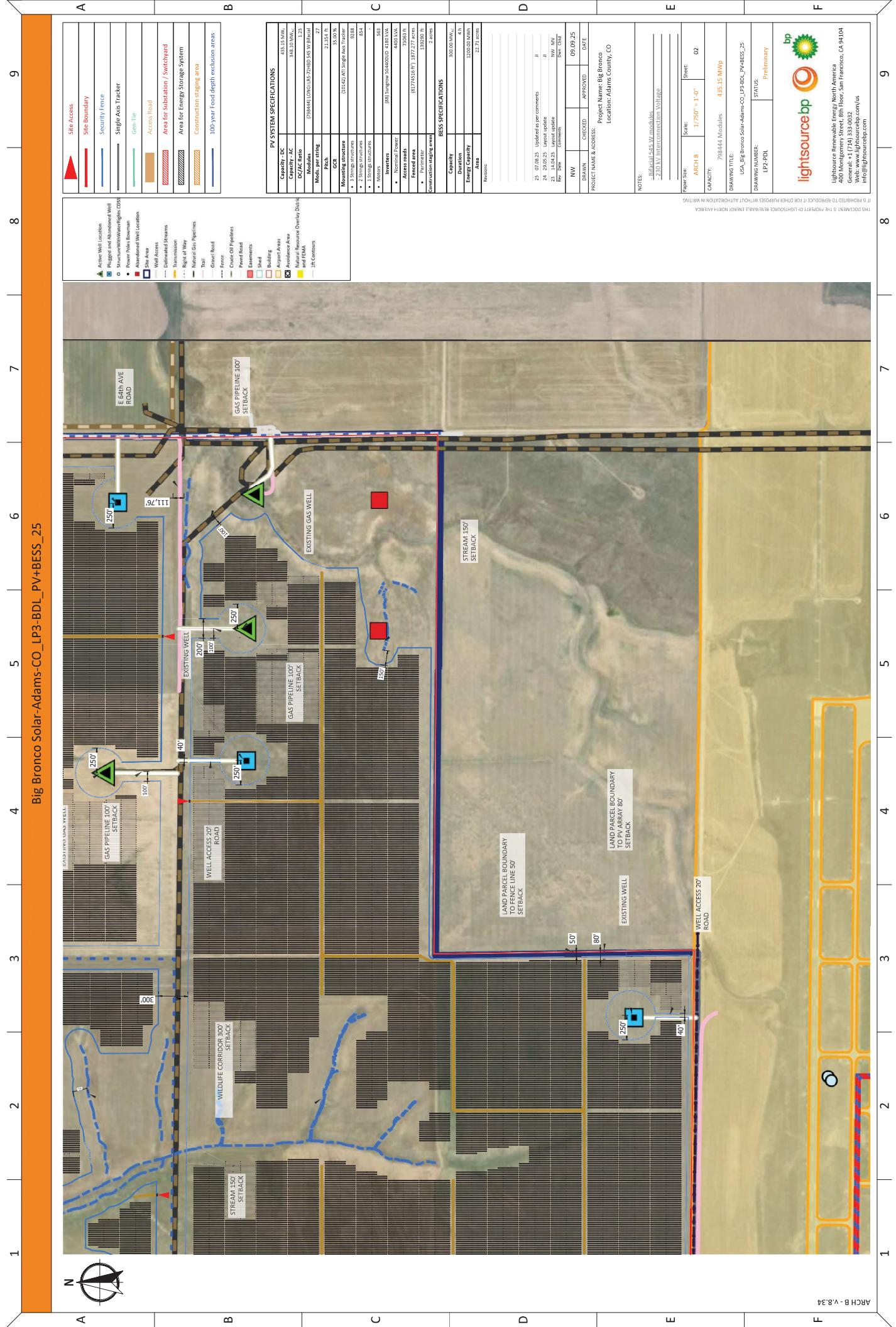




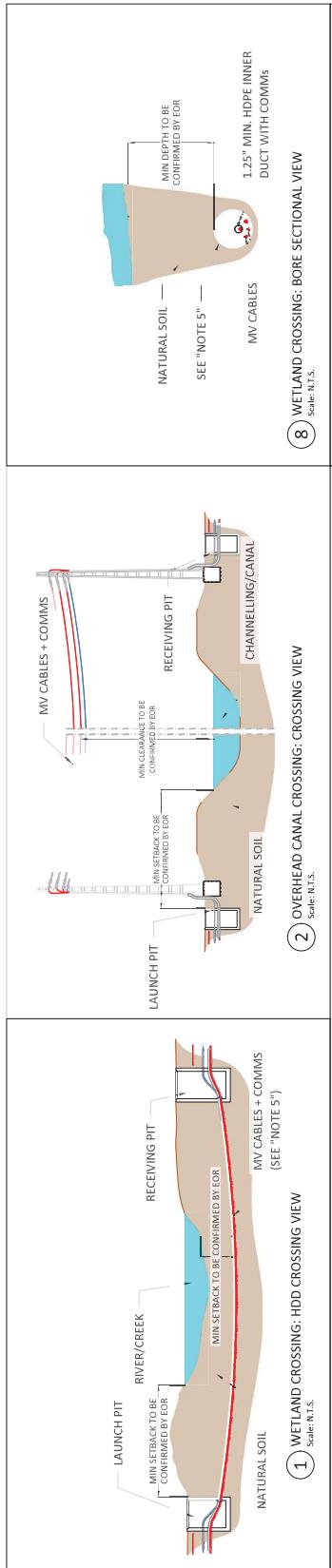








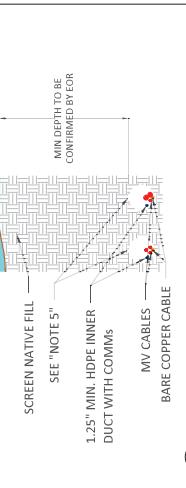
Big Bronco Solar-Adams-CO_LP3-BDL_PV+BESS_25 (Crossing details)



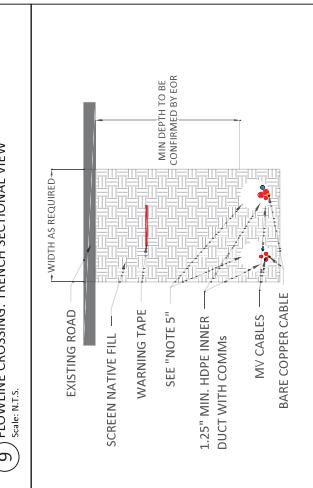
1. The number of cables shown is generic and to be defined in later design stage.
2. HFD refers to horizontal directional Drill.
3. Backfill material and compaction to be determined by geotechnical report.
4. Cable spacing to be determined by geotechnical report and final amperage study.
5. Use pipe material listed/suitable for this application.
6. Where not specified, minimum required setback and/or depth to be identified by engineer of record and authority having jurisdiction.
7. If local standards/norms are more restrictive, these should be applied.

WIBITED TO REPRODUCED FOR OTHER PURPOSES WITHOUT AUTHORIZATION IN WRITING
5 THE PROPERTY OF UGHSOURCE ENERGY NORTH AMERICA
SUBMITTED BY

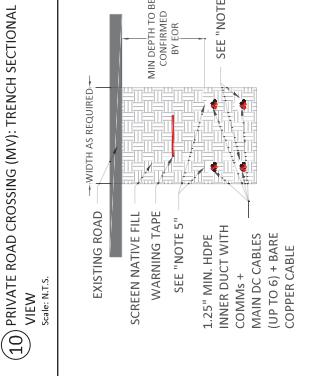
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IS PRO



8 WETLAND CROSSING: BORE SECTIONAL VIEW
Scale: N.T.S.



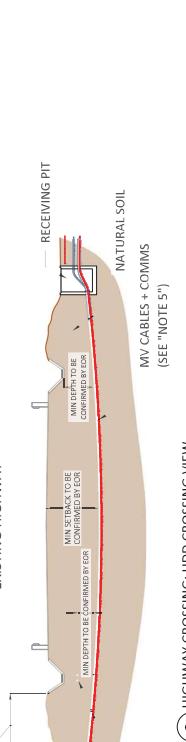
EXISTING ROAD ————— WHICH IS REQUIRED.



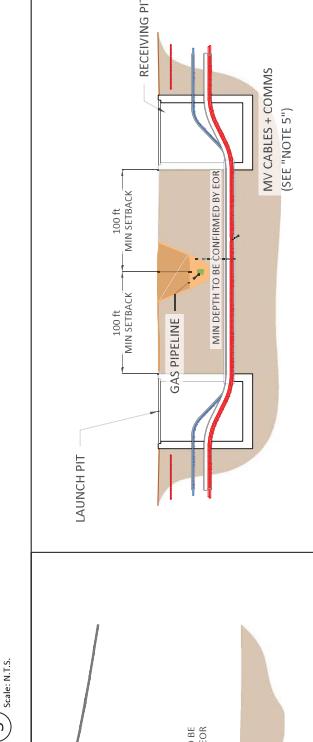
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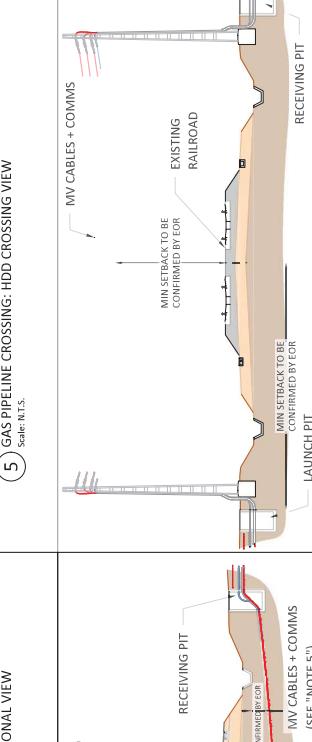
11 PRIVATE
VIEW



2 OVERHEAD Scale: N.T.S.



LAUNCH PIT



5 GAS PIPELINE CROSSING: HOD CROSSING VIEW



OVERVIEW

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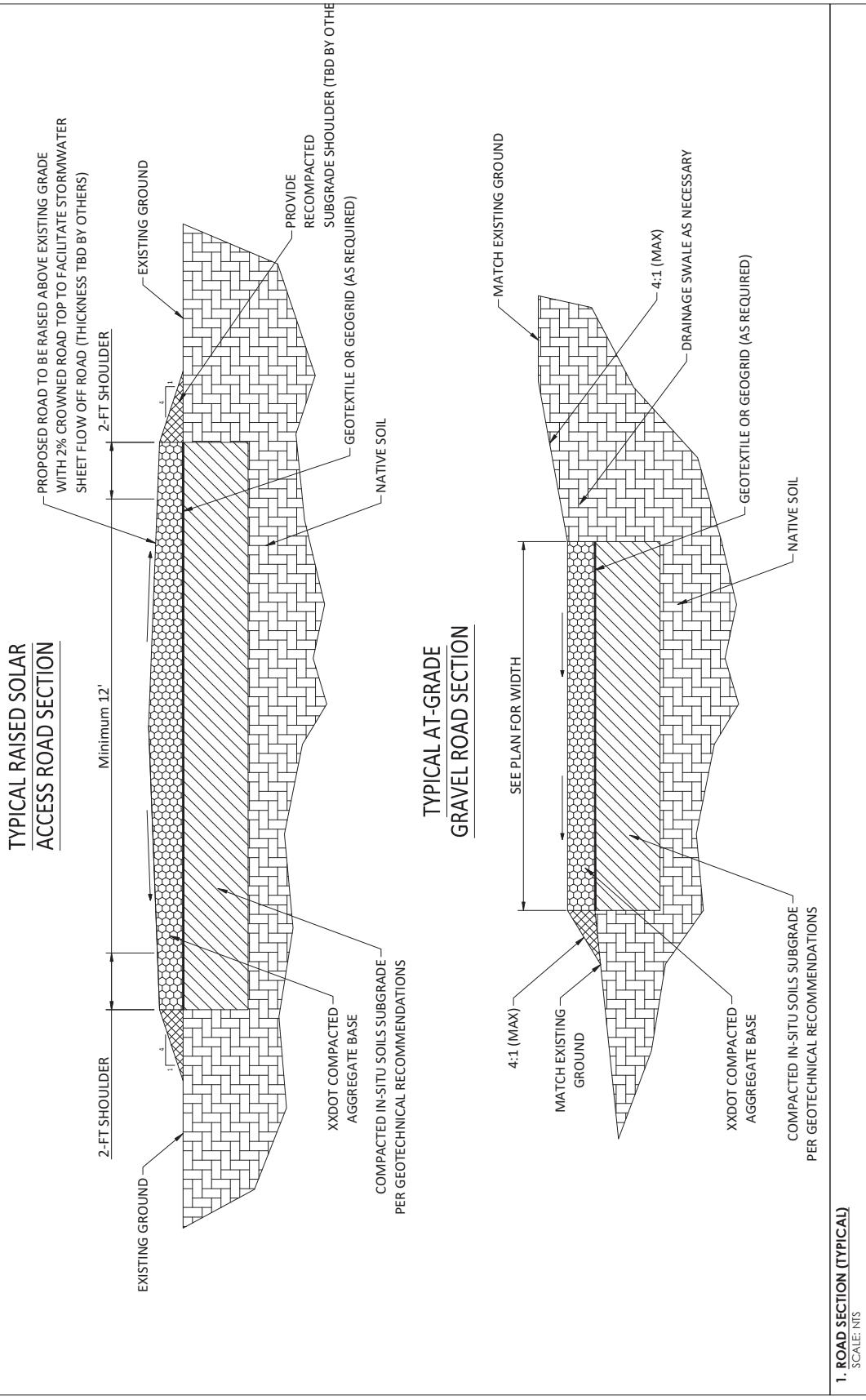
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USA-BIB-ENG-CIV-DRG-0002-Typical Solar Access Road_00



Arch B - V6.1

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Revision: _____

00 30.05.25 Basic Design
Rev. Date Comments JI Draw. Check

E

Page Date: 30/05/2015

DRAWN	CHECKED	APPROVED
Project Name: Big Bounce		
Location: Adams County, CO		

NOTES: _____

Page Date: Scale: 0.15 Sheet: 01

F

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DRAWING TITLE: Typical Solar Access Road

DRAWING NUMBER: ENG-CIV-DRG-0002

STATUS: Basic Design

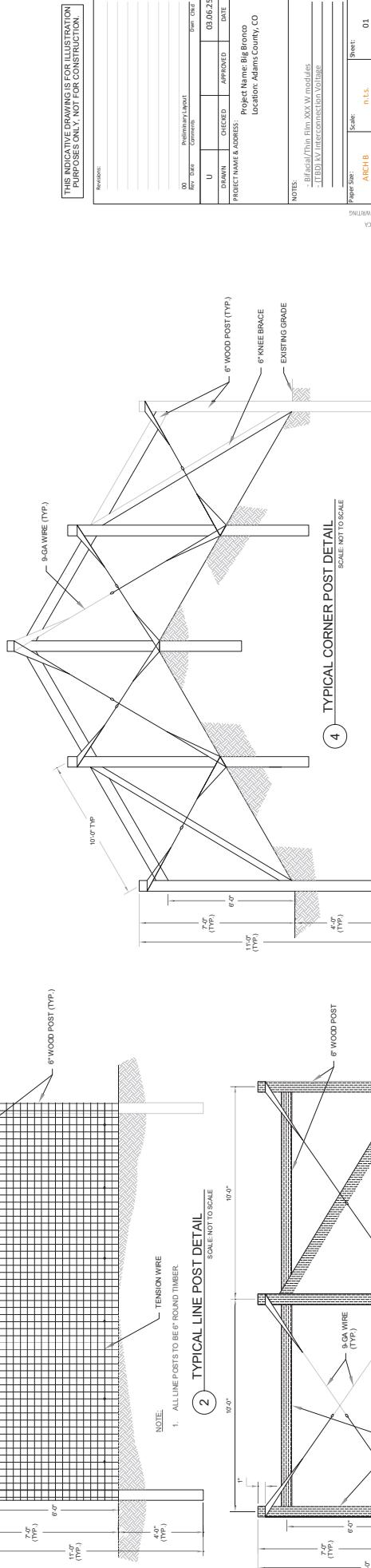
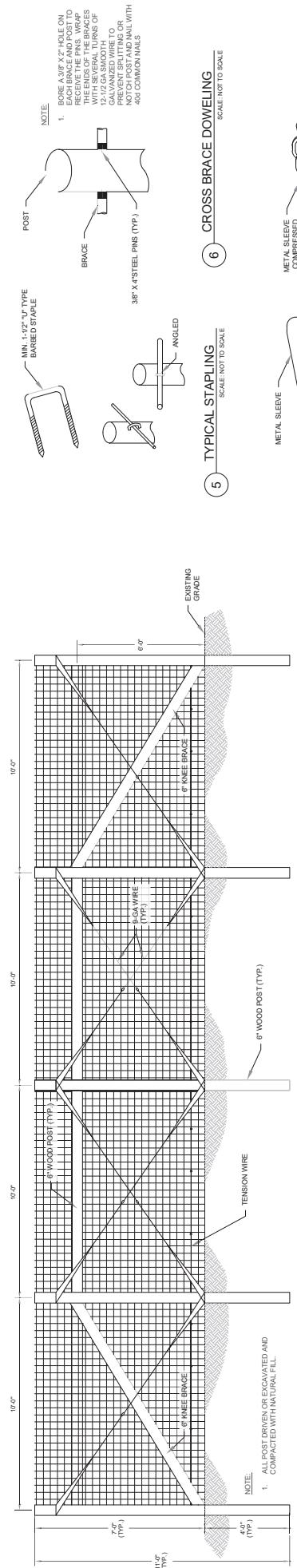
DATE: 30/05/2015

Lightsource bp 

Lightsource Renewable Energy North America
400 Montgomery Street, 8th Floor, San Francisco, CA 94104
General: +1 713 333-0032
Web: www.lightsourcebp.com
Email: info@lightsourcebp.com

INDICATIVE DRAWINGS

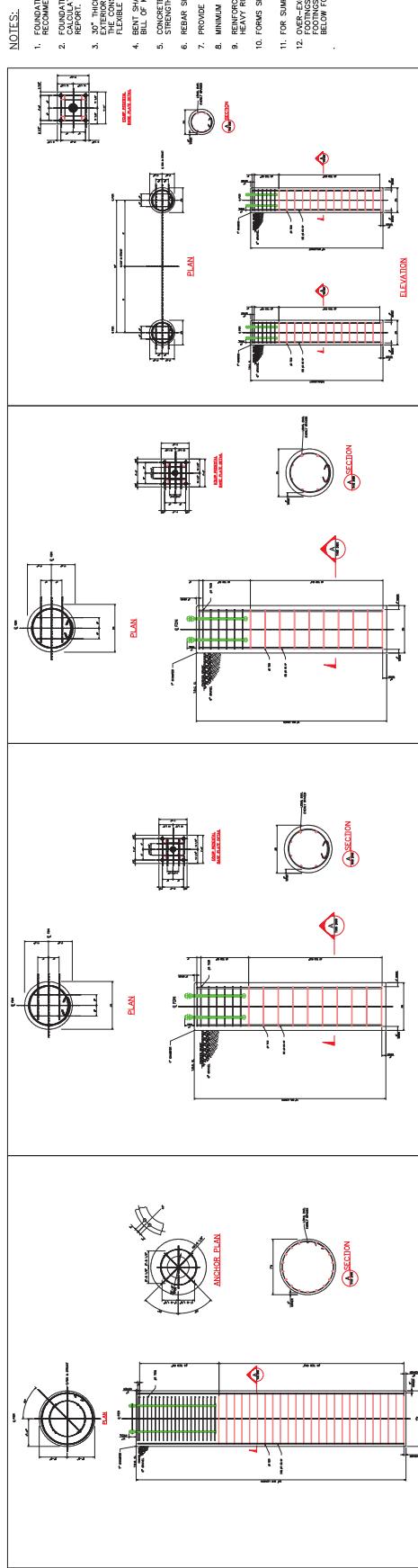
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USA-BB-ENG-CIV-DRG-0005-HV SUBSTATION FOUNDATION DETAILS

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A



1. 230 kV H-FRAME DEADEND (1PH)
SCALE: NTS

2. 230 kV EQUIPMENT PEDESTAL AND LOW BUS SUPPORT
SCALE: NTS

3. 230 kV HIGH BUS SUPPORT
SCALE: NTS

4. 230 kV SWITCHES SUPPORT
SCALE: NTS

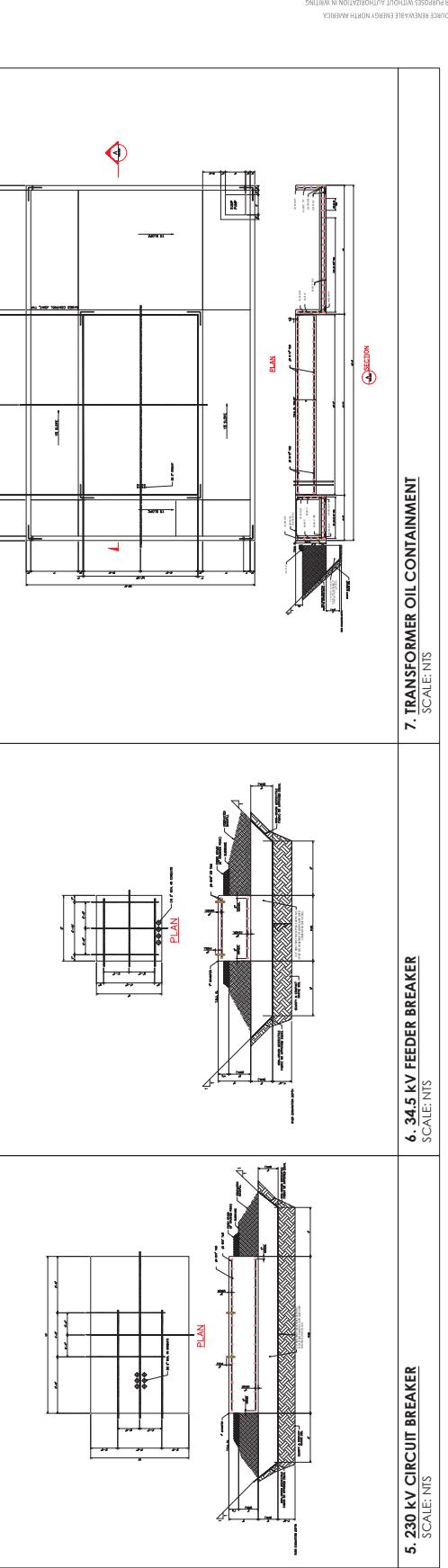
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C

D

E

A



NOTES:

5. 230 kV CIRCUIT BREAKER
SCALE: NTS

6. 34.5 kV FEEDER BREAKER
SCALE: NTS

7. TRANSFORMER OIL CONTAINMENT
SCALE: NTS

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Lightsource Renewable Energy North America
400 Montgomery Street, 8th Floor, San Francisco, CA 94104
General: +1715 333-0032
Web: www.lightsourcebp.com/us
Email: info@lightsourcebp.com

1. FOUNDATION MINIMUM DIMENSIONS ARE BASED ON THE RECOMMENDATION OF THE GEOTECHNICAL REPORT PRODUCED FOR HANKS CROSSING ENERGY, LLC BY G2 CONSULTING GROUP ON FEB 14, 2024.

2. FOUNDATIONS ARE BASED TO BE CONFIRMED THRU STRUCTURAL DESIGN CALCULATIONS BASED ON THE RECOMMENDATIONS FOUND IN THE GEOTECHNICAL REPORT PRODUCED FOR HANKS CROSSING ENERGY, LLC BY G2 CONSULTING GROUP ON FEB 14, 2024.

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5.0 Proof of Ownership

DOCUMENT PREPARED BY
AFTER RECORDING RETURN TO:

Lightsource Renewable Energy Development LLC
11921 N. Mopac Expressway, Suite 110
Austin, TX 78759
Attn: Real Estate

THIS SPACE FOR RECORDERS USE ONLY

**MEMORANDUM OF FIRST AMENDMENT TO SOLAR LEASE AND EASEMENT
AGREEMENT**

THIS MEMORANDUM OF FIRST AMENDMENT TO SOLAR LEASE AND EASEMENT AGREEMENT (this “**Memorandum**”), is made, dated and effective as of March 7, 2023, between Minis Adon Corporation, a Wisconsin corporation (together with its transferees, successors and assigns, comprising “**Owner**”), whose address is 4904 Kingston Drive, Annandale, VA 22003-6149, and Lightsource Renewable Energy Development LLC, a Delaware limited liability company (together with its transferees, successors and assigns, “**Grantee**”), whose address is 400 Montgomery Street, Eighth Floor, San Francisco, CA 94014, with regards to the following:

1. Owner and Eagle Solar Group, LLC, a Delaware limited liability company (together with its transferees, successors and assigns) entered into that certain Solar Lease and Easement Agreement dated and made effective as of November 25, 2017 (the “**Agreement**”), as evidenced by that Memorandum of Solar Lease and Easement Agreement recorded on December 26, 2017, as Reception# 2017000113314, in the Official Records of Adams County, Colorado, which encumbers certain real property described on **Exhibit A** attached hereto and incorporated herein by this reference.

2. Eagle Solar assigned all of its right, title, and interest in the Agreement to KL Solar Development LLC, a Maryland limited liability company (“**KL Solar**”), by that certain Assignment and Assumption Agreement dated and made effective as of August 6, 2018, as evidenced by the Memorandum of Assignment and Assumption Agreement recorded on March 15, 2023, as Reception# 2023-000013804, in the Official Records of Adams County, Colorado.

3. KL Solar assigned all of its right, title, and interest in the Agreement to Grantee, by that certain Assignment and Assumption Agreement dated and made effective as of November 14, 2018, and recorded on March 15, 2023, as Reception# 2023000013805, in the Official Records of Adams County, Colorado.

4. Owner and Grantee did enter into that certain First Amendment to Solar Lease and Easement Agreement (“**Amendment**”) dated March 7, 2023 (“**Amendment Date**”), to modify certain terms and conditions of the Agreement, as provided in the Amendment, and in consideration of the mutual covenants contained therein and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged.

5. Owner and Grantee desire to record this Memorandum to put third parties on notice of certain terms of the Amendment. Capitalized terms used and not defined herein have the meaning given the same in the Agreement.

6. The Amendment modifies, among other things, the term of the Agreement, wherein the Development Term shall continue until the Fifth (5th) anniversary of the Amendment Date, unless earlier terminated pursuant to the terms and conditions of the Agreement. Upon expiration of the Development Term, subject to the terms and conditions therein, the Agreement as amended, shall continue for a Construction Term, beginning on the Commencement Date set forth in the Construction Notice, and followed by an Operations Term for a period of twenty-five (25) years. Upon expiration of the Operations Term, Grantee will have the right to extend the operations term for three (3) additional periods of five (5) years each, up to a cumulative time period of forty (40) years from the start of the Operations Term.

7. This Memorandum does not supersede, modify, amend or otherwise change the terms, conditions or covenants of the Agreement or Amendment, and Owner and Grantee executed and are recording this Memorandum solely for the purpose of providing constructive notice of the Amendment and Grantee's rights thereunder. The terms, conditions and covenants of the Agreement and Amendment are set forth at length in the Agreement and Amendment and are incorporated herein by reference as though fully set forth herein. This Memorandum shall not, in any manner or form whatsoever, alter, modify or vary the terms, covenants and conditions of the Agreement or Amendment.

8. This Memorandum shall also bind and benefit, as the case may be, the heirs, legal representatives, assigns and successors of the respective parties hereto, and all covenants, conditions and agreements contained herein shall be construed as covenants running with the land.

9. This Memorandum may be executed in counterparts, each of which shall be deemed an original and all of which when taken together shall constitute one and the same document.

[SIGNATURE AND ACKNOWLEDGEMENT PAGES TO FOLLOW]

IN WITNESS WHEREOF, the parties have executed this Memorandum to be effective as of the date first written above.

OWNER:

Minis Adon Corporation,
a Wisconsin corporation

By: Adrian Hilz
Name: Adrian Hilz
Title: President

ACKNOWLEDGMENT OF OWNER

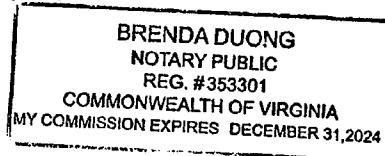
STATE OF Virginia
COUNTY OF Alexandria SS.

On this 26 day of Feb 2023, in the year 2023, before me appeared Adrian Hilz, whose identity is personally known to me (or proved on the basis of satisfactory evidence) and who by me duly sworn/affirmed, did say that she is the President of Minis Adon Corporation, a Wisconsin corporation, and that the document was signed by her in said capacity on behalf of the corporation.

Witness my hand and official seal.

R. Duong

(Notary Signature)



(S E A L)

Name: Brenda Duong
Notary Public, State of Virginia
My Commission Expires: 12-31-2024

IN WITNESS WHEREOF, the parties have executed this Memorandum to be effective as of the date first written above.

GRANTEE:

Lightsource Renewable Energy
Development LLC, a Delaware corporation

By: Kevin B. Smith
Name: Kevin B. Smith
Title: CEO, Americas

ACKNOWLEDGMENT OF GRANTEE

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

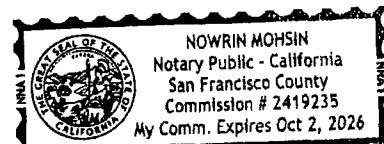
STATE OF California)
) ss.
COUNTY OF San Francisco)

On March 27, 2023, before me Nowrin Mohsin, Notary Public personally appeared Kevin B. Smith, who proved to me on the basis of satisfactory evidence to be the person(s), whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Nowrin Mohsin
Notary Public



(seal)

EXHIBIT A

Description of the Property in Adams County, Colorado

All of Section 3, Township 3 South, Range 64 West of the 6th P.M., in the County of Adams and State of Colorado.

DOCUMENT PREPARED BY AND
AFTER RECORDING, PLEASE RETURN TO:

Lightsource Renewable Energy Development LLC
11921 N. Mopac Expressway
Suite 110
Austin, TX 78759

MEMORANDUM OF OPTION FOR GROUND LEASE AGREEMENT AND EASEMENTS

This MEMORANDUM OF OPTION FOR GROUND LEASE AGREEMENT AND EASEMENTS (this "Memorandum") is made and entered into as of July 12, 2022, by Qualls and Palmer LLC (the "Landlord"), and LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT LLC, a Delaware limited liability company ("Tenant"), with respect to the following facts:

RECITALS

WHEREAS, Landlord is the owner of the real property located in Adams County, State of Colorado, more particularly described in Exhibit A, attached hereto and made a part hereof (the "Property").

WHEREAS, the parties hereto desire to enter into this Memorandum so that third parties shall have notice of the existence of the Agreement and of the rights and obligations of Landlord and Tenant thereunder.

NOW, THEREFORE, the parties hereto do hereby certify and agree as follows:

1. **Option to Lease.** As set forth more fully in the Agreement, Landlord granted to Tenant an option to lease all or a portion of the Land in accordance with the terms and provisions of the Agreement. Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Agreement.

2. **Option Period.** The Option Period commenced on the Effective Date and, unless earlier exercised or terminated pursuant to the terms and conditions of the Agreement, shall expire five (5) years thereafter.

3. **Lease Term.** If Tenant exercises the Option, the Lease Term shall commence on the Commencement Date set forth in the Option Notice and shall terminate on the date that is twenty-five (25) years after the Commercial Operation Date. If Tenant exercises the Option, Tenant has three (3) options to extend the Lease Term for five (5) years each.

4. **Easements.** As set forth more fully in the Agreement, Landlord also granted to Tenant an option to obtain: (a) a non-exclusive, appurtenant easement to access the Land and to construct, maintain, reconstruct, and/or repair a road and/or pedestrian access on, over, across and through the Property and (b) a non-exclusive, appurtenant easement for constructing, placing, operating, maintaining, reconstructing, replacing, rebuilding, upgrading, removing, inspecting, modifying and/or repairing aboveground electrical transmission lines and a line or lines of poles or towers, together with such wires and cables and communications lines as from time to time are suspended therefrom, and/or underground wires and cables, for the transmission of electrical energy and/or for communication purposes, and all necessary and proper anchors, support structures, foundations, footings, cross arms and other appliances and fixtures for use in connection with said towers, wires and cables, in each case upon, through, over, across and/or under, as applicable.

5. Solar Energy Insolation. As set forth more fully in the Agreement, Landlord also granted to Tenant an option to obtain, the right and privilege to the free and unobstructed insolation of solar energy over and to the Land. Landlord's activities and any grant of rights Landlord makes to any person or entity, whether located on the Premises or elsewhere, shall not, currently or prospectively, interfere with the construction, installation, maintenance, or operation of the Solar Facility and/or access over the Premises to such Solar Facility and/or Tenant's rights to use the Premises as permitted pursuant to the Lease. Without limiting the generality of the foregoing, Landlord shall not (and shall not allow any other party to) disturb or interfere with the unobstructed flow of Solar Energy upon, over and across the Land, whether by placing towers or antennas of any type, planting trees or constructing buildings or other structures or facilities, or by engaging in any other activity on the Land or elsewhere that might delay the installation of, disrupt, or otherwise cause a decrease in the output or efficiency of the Solar Facility, which shall be granted to Tenant upon Tenant's delivery of the Option Notice.

6. Personal Property. The parties agree that the Improvements are severed by agreement and intention of the parties and shall remain severed from the Premises, and, even though attached or affixed to or installed upon the Premises, shall not be considered to be fixtures or a part of the Premises and shall not be or become subject to the lien of any mortgage or deed of trust placed on the Premises by Landlord.

7. Successors and Assigns. The Lease provides that the provisions of the Lease are binding upon and inure to the benefit of Landlord and Tenant and each of their respective representatives, successors and assigns, subject to the terms and provisions thereof.

8. Incorporation/Conflicts. All of the terms, conditions and agreements contained within the Lease are fully incorporated herein by reference as if fully set forth herein. This Memorandum is not intended to change the terms of the Lease and, in the event of a conflict between the terms and conditions of this Memorandum and the Lease, the terms and conditions of the Lease shall control.

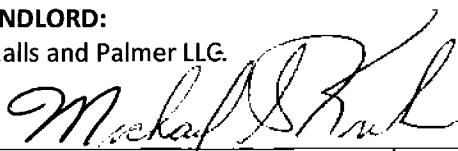
9. Governing Law. This Memorandum shall be governed by the laws of state in which the Property is located.

10. Counterparts. The parties agree that this Memorandum may be executed in multiple counterparts which, when signed by all parties, shall constitute a binding agreement.

IN WITNESS WHEREOF the parties hereto have caused this Memorandum to be executed on the date written above.

LANDLORD:

Qualls and Palmer LLC.



Name: MICHAEL S Krek
Title: OPERATIONS Manager, Qualls and Palmer, LLC

Name:

Title:

State of Georgia }
County of Fulton }

I, the undersigned Notary Public, hereby certify that Michael S Krek, as ops manager of Qualls and Palmer, LLC, whose name is signed to the foregoing conveyance, and who is known to me or proved to me on the basis of satisfactory evidence, acknowledged before me on this day that, being informed of the contents of the conveyance, he/she executed the same voluntarily on the day the same bears date.

Given under my hand this July, 2022.



Natasha N. B.
Notary Public
My Commission Expires: 12/04/2022

State of _____ }
County of _____ }

I, the undersigned Notary Public, hereby certify that _____ as _____ of Qualls and Palmer, LLC, whose name is signed to the foregoing conveyance, and who is known to me or proved to me on the basis of satisfactory evidence, acknowledged before me on this day that, being informed of the contents of the conveyance, he/she executed the same voluntarily on the day the same bears date.

Given under my hand this _____ day of _____, 2022.

(Seal)

Notary Public
My Commission Expires: _____

TENANT:

LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT LLC

2

Ken Brink

Kevin B. Smith

John E. Smith
Chief Executive Officer

STATE OF TEXAS)
COUNTY OF TRAVIS)
) ss.

On July 12, 2022 before me the undersigned, Notary Public personally appeared Kevin B. Smith, as Chief Executive Officer of Lightsource Renewable Energy Development LLC, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal,

—Tad

Notary Public



(seal)

EXHIBIT A

ALL that real property situated in Adams County in the state of Colorado, described as follows:

AP#'s: R0083292

PARCEL 1:

ALL of Section 5, T3S, R64W of the 6th Principal Meridian.

Also known and numbered as 6800 Imboden Road, Watkins, Colorado 80137.

DOCUMENT PREPARED BY AND
AFTER RECORDING, PLEASE RETURN TO:

Lightsource Renewable Energy Development LLC
11921 N. Mopac Expressway, Suite 110
Austin, TX 78759

MEMORANDUM OF OPTION FOR GROUND LEASE AGREEMENT AND EASEMENTS

This MEMORANDUM OF OPTION FOR GROUND LEASE AGREEMENT AND EASEMENTS (this "Memorandum") is made and entered into as of September 20, 2022, by and Lanny J. Larson and Deborah L. Larson, Trustees of the Larson Revocable Trust, dated November 9, 2017 (collectively, the "Landlord"), and LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT LLC, a Delaware limited liability company ("Tenant"), with respect to the following facts:

RECITALS

WHEREAS, Landlord is the owner of the real property located in Adams County, State of Colorado, more particularly described in Exhibit A, attached hereto and made a part hereof (the "Property").

WHEREAS, pursuant to that certain Option, Ground Lease and Easement Agreement (the "Agreement"), dated as of September 20, 2022 (the "Effective Date"), by and between Landlord and Tenant, Landlord granted an option to Tenant to lease all or a portion of the Property (such leased areas, the "Land") and to obtain one or more easements over portions of the Property that are not part of the Land.

WHEREAS, the parties hereto desire to enter into this Memorandum so that third parties shall have notice of the existence of the Agreement and of the rights and obligations of Landlord and Tenant thereunder.

NOW, THEREFORE, the parties hereto do hereby certify and agree as follows:

1. **Option to Lease.** As set forth more fully in the Agreement, Landlord granted to Tenant an option to lease all or a portion of the Land in accordance with the terms and provisions of the Agreement. Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Agreement.

2. **Option Period.** The Option Period commenced on the Effective Date and, unless earlier exercised or terminated pursuant to the terms and conditions of the Agreement, shall expire five (5) years thereafter.

3. **Lease Term.** If Tenant exercises the Option, the Lease Term shall commence on the Commencement Date set forth in the Option Notice and shall terminate on the date that is twenty-five (25) years after the Commercial Operation Date. If Tenant exercises the Option, Tenant has three (3) options to extend the Lease Term for five (5) years each.

4. **Easements.** As set forth more fully in the Agreement, Landlord also granted to Tenant an option to obtain: (a) a non-exclusive, appurtenant easement to access the Land and to construct, maintain, reconstruct, and/or repair a road and/or pedestrian access on, over, across and through the Property and (b) a non-exclusive, appurtenant easement for constructing, placing, operating, maintaining, reconstructing, replacing, rebuilding, upgrading, removing, inspecting, modifying and/or repairing

reconstructing, replacing, rebuilding, upgrading, removing, inspecting, modifying and/or repairing aboveground electrical transmission lines and a line or lines of poles or towers, together with such wires and cables and communications lines as from time to time are suspended therefrom, and/or underground wires and cables, for the transmission of electrical energy and/or for communication purposes, and all necessary and proper anchors, support structures, foundations, footings, cross arms and other appliances and fixtures for use in connection with said towers, wires and cables, in each case upon, through, over, across and/or under, as applicable.

5. Solar Energy Insolation. As set forth more fully in the Agreement, Landlord also granted to Tenant an option to obtain, the right and privilege to the free and unobstructed insolation of solar energy over and to the Land. Landlord's activities and any grant of rights Landlord makes to any person or entity, whether located on the Premises or elsewhere, shall not, currently or prospectively, interfere with the construction, installation, maintenance, or operation of the Solar Facility and/or access over the Premises to such Solar Facility and/or Tenant's rights to use the Premises as permitted pursuant to the Lease. Without limiting the generality of the foregoing, Landlord shall not (and shall not allow any other party to) disturb or interfere with the unobstructed flow of Solar Energy upon, over and across the Land, whether by placing towers or antennas of any type, planting trees or constructing buildings or other structures or facilities, or by engaging in any other activity on the Land or elsewhere that might delay the installation of, disrupt, or otherwise cause a decrease in the output or efficiency of the Solar Facility, which shall be granted to Tenant upon Tenant's delivery of the Option Notice.

6. Personal Property. The parties agree that any improvements, equipment, buildings, foundations, poles, towers or transmission lines at any time constructed by or for Tenant on the Premises, or at any time acquired by or for Tenant and located on the Premises, including, without limitation, the Solar Facility (the "Improvements") are hereby severed from the Premises by agreement and intention of the parties and shall remain severed from the Premises, and shall be considered with respect to the interests of the parties hereto as the personal property of Tenant or a Financing Party designated by Tenant, and, even though attached or affixed to or installed upon the Premises, shall not be considered to be fixtures or a part of the Premises and shall not be or become subject to the lien of any mortgage or deed of trust heretofore or hereafter placed on the Premises by Landlord.

7. Successors and Assigns. The Lease provides that the provisions of the Lease are binding upon and inure to the benefit of Landlord and Tenant and each of their respective representatives, successors and assigns, subject to the terms and provisions thereof.

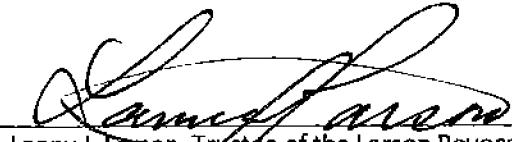
8. Incorporation/Conflicts. All of the terms, conditions and agreements contained within the Lease are fully incorporated herein by reference as if fully set forth herein. This Memorandum is not intended to change the terms of the Lease and, in the event of a conflict between the terms and conditions of this Memorandum and the Lease, the terms and conditions of the Lease shall control.

9. Governing Law. This Memorandum shall be governed by the laws of the state of Colorado.

10. Counterparts. The parties agree that this Memorandum may be executed in multiple counterparts which, when signed by all parties, shall constitute a binding agreement.

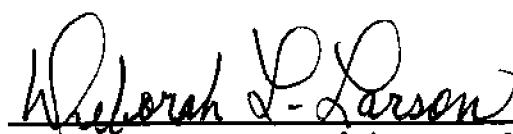
IN WITNESS WHEREOF the parties hereto have caused this Memorandum to be executed on the date written above.

LANDLORD:



Lanny J. Larson, Trustee of the Larson Revocable Trust, dated

November 9, 2017

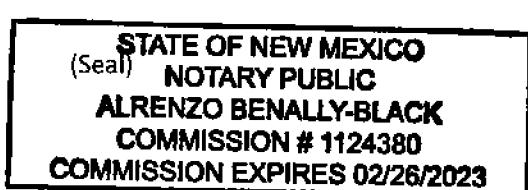


Deborah Larson, Trustee of the Larson Revocable Trust,
dated November 9, 2017

State of NEW MEXICO }
} }
County of BENALMENO }

I, the undersigned Notary Public, hereby certify that Lanny J. Larson and Deborah Larson, as Trustees of the Larson Revocable Trust, dated November 9, 2017, whose name is signed to the foregoing conveyance, and who is known to me or proved to me on the basis of satisfactory evidence, acknowledged before me on this day that, being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand this 13th day of SEPTEMBER, 2022.

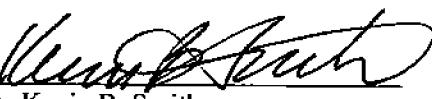


Notary Public
My Commission Expires: 2/26/23

IN WITNESS WHEREOF the parties hereto have caused this Memorandum to be executed on the date written above.

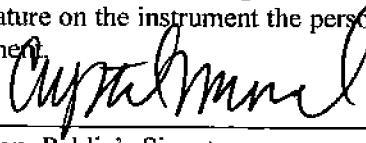
TENANT:

**LIGHTSOURCE RENEWABLE ENERGY
DEVELOPMENT, LLC,
a Delaware limited liability company**

By: 
Name: Kevin B. Smith
Its: Chief Executive Officer

STATE OF TEXAS)
)
COUNTY OF HARRIS) ss.

This instrument was acknowledged before me on 20th day of September, 2022 by **Kevin B. Smith**, as **Chief Executive Officer of Lightsource Renewable Energy Development, LLC, a Delaware limited liability company**, who proved to me on the basis of satisfactory evidence to be the person, whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity and that by his signature on the instrument the person or the entity upon behalf of which the person acted, executed the instrument.


Notary Public's Signature

(SEAL)

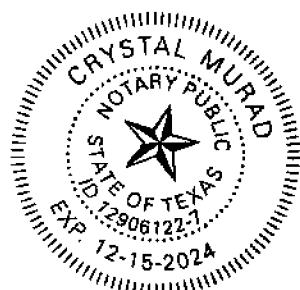


EXHIBIT A

ALL that real property situated in Adams County in the state of Colorado, described as follows:

ASSESSOR ACCOUNT #'s: R0083291, R0083300, R0083299, R0083296, R0083298

PARCEL 1:

ALL of Section 9, T3S, R64W of the 6th Principal Meridian. Excepting approximately 7.32 acres in a rectangular shape approximately 425' by 750', located in the NW $\frac{1}{4}$ SW $\frac{1}{4}$ and SW $\frac{1}{4}$ NW $\frac{1}{4}$ on which is currently located a house and outbuildings.

PARCEL 2:

The N $\frac{1}{2}$ of Section 10, T3S, R64W of the 6th Principal Meridian.

PARCEL 3:

The NE $\frac{1}{4}$ and the E $\frac{1}{2}$ of the SE $\frac{1}{4}$ except the south 45 feet thereof as disclosed by Resolution recorded January 31, 1984 in Book 2835 at Page 814 and re-recorded February 8, 1984 in Book 2838 at page 540, all in Section 8, T3S, R64W of the 6th Principal Meridian. Excepting approximately .40 acres located in the SE $\frac{1}{4}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ on which is currently located a house.

PARCEL 4:

The SE $\frac{1}{4}$; the S $\frac{1}{2}$ of the SW $\frac{1}{4}$; the NW $\frac{1}{4}$ of the SW $\frac{1}{4}$, all in Section 4, T3S, R64W of the 6th Principal Meridian.

Also known and numbered as 5160 Quail Run Road, Watkins, Colorado 80137.

DOCUMENT PREPARED BY AND
AFTER RECORDING, PLEASE RETURN TO:

LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT LLC,
a Delaware limited liability company
400 Montgomery Street, 8th Floor
San Francisco, CA 94104
Attn: Real Estate Department

**MEMORANDUM OF OPTION TO PURCHASE AGREEMENT AND JOINT ESCROW
INSTRUCTIONS**

This MEMORANDUM OF OPTION TO PURCHASE AGREEMENT AND JOINT ESCROW INSTRUCTIONS (this "Memorandum") is made and entered into as of August 7, 2025, by and between Davis Farm, LLC, a Colorado limited liability company ("Seller"), and LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT LLC, a Delaware limited liability company ("Buyer"), with respect to the following facts:

RECITALS

WHEREAS, Seller is the owner of the real property located in Adams County, Colorado, more particularly described in Exhibit A, attached hereto and made a part hereof (the "Property").

WHEREAS, pursuant to that certain Option To Purchase Agreement and Joint Escrow Instructions (the "Option"), dated as of August 7, 2025 (the "Effective Date"), by and between Seller and Buyer, Seller granted an option to Buyer to purchase the Property together with (a) all improvements, structures, fixtures, and related amenities in and on the Property, if any (the "Improvements"), (b) all easements, rights, and appurtenances, if any, benefiting the Property or the Improvements, including, without limitation, any and all right, title, and interest in and to adjacent streets, alleys, and rights-of-way ("Rights"); (c) all appliances, fixtures, equipment, machinery, and other personal property, if any, located on or about the Property and Improvements (the "Tangible Property"), and (d) all intangible property, if any, owned by Seller and pertaining to the Property, Rights, Improvements, or Tangible Property, including, without limitation, any contracts (to the extent expressly assumed by Buyer), permits, licenses, approvals, guaranties, claims, rights to payments, warranties, land use entitlements and rights, transferable utility contracts, utility deposits, plans and specifications, engineering plans and studies, government approvals, development deposits and fees, floor plans, landscape plans, licenses, trade names, permits, franchises, and license agreements (if any) ("Intangible Property").

WHEREAS, the parties hereto desire to enter into this Memorandum so that third parties shall have notice of the existence of the Option and of the rights and obligations of Seller and Buyer thereunder.

NOW, THEREFORE, the parties hereto do hereby certify and agree as follows:

1. Option to Purchase. As set forth more fully in the Option, Seller granted to Buyer an option to purchase the Property in accordance with the terms and provisions of the Option. Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Option.

2. Term. The term of the Option (the "Term") commenced on the Effective Date and, unless earlier exercised or terminated pursuant to the terms and conditions of the Option, shall expire forty eight (48) months thereafter, unless sooner exercised as provided herein or extended by written agreement of the parties.

3. Miscellaneous. The Option provides that the provisions of the Option are binding upon and inure to the benefit of Seller and Buyer and each of their respective representatives, successors and assigns, subject to the terms and provisions thereof. All of the terms, conditions and agreements contained within the Option are fully incorporated herein by reference as if fully set forth herein. This Memorandum is not intended to change the terms of the Option and, in the event of a conflict between the terms and conditions of this Memorandum and the Option, the terms and conditions of the Option shall control. This Memorandum shall be governed by the laws of the State in which this Memorandum is being recorded. The parties agree that this Memorandum may be executed in multiple counterparts which, when signed by all parties, shall constitute a binding agreement.

[Signature Page Follows]

IN WITNESS WHEREOF the parties hereto have caused this Memorandum to be executed on the date written above.

SELLER:

Davis Farm, LLC,
a Colorado limited liability company

By: Dennis T. Davis
Name: Dennis T. Davis
Its: Manager

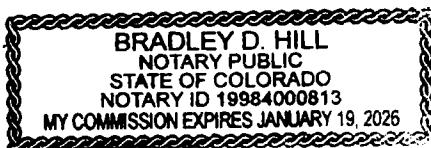
State of Colorado
County of Denver

This record was acknowledged before me on August 6, 2025, by Dennis T Davis as Manager of Davis Farm, LLC, a Colorado limited liability company, on behalf of the limited liability company.

Bradley D. Hill
(Notary's official signature)

Notary Public
(Title of office)

January 19, 2026
(Commission Expiration)



IN WITNESS WHEREOF the parties hereto have caused this Memorandum to be executed on the date written above.

BUYER:

LIGHTSOURCE RENEWABLE ENERGY DEVELOPMENT, LLC,
a Delaware limited liability company

By: David Revelt

Name: David Revelt

Its: General Counsel and Senior Vice President,
Commercial Operations

STATE OF CALIFORNIA

)

) ss.

COUNTY OF SAN FRANCISCO

)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On August 7, 2025 before me Jennifer Butynski, Notary Public personally appeared David Revelt, General Counsel and Senior Vice President, Commercial Operations, who proved to me on the basis of satisfactory evidence to be the person, whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

Jennifer Butynski

NOTARY PUBLIC

Seal



EXHIBIT A

DESCRIPTION OF THE PROPERTY

That certain land located in Adams County, Colorado described as follows:

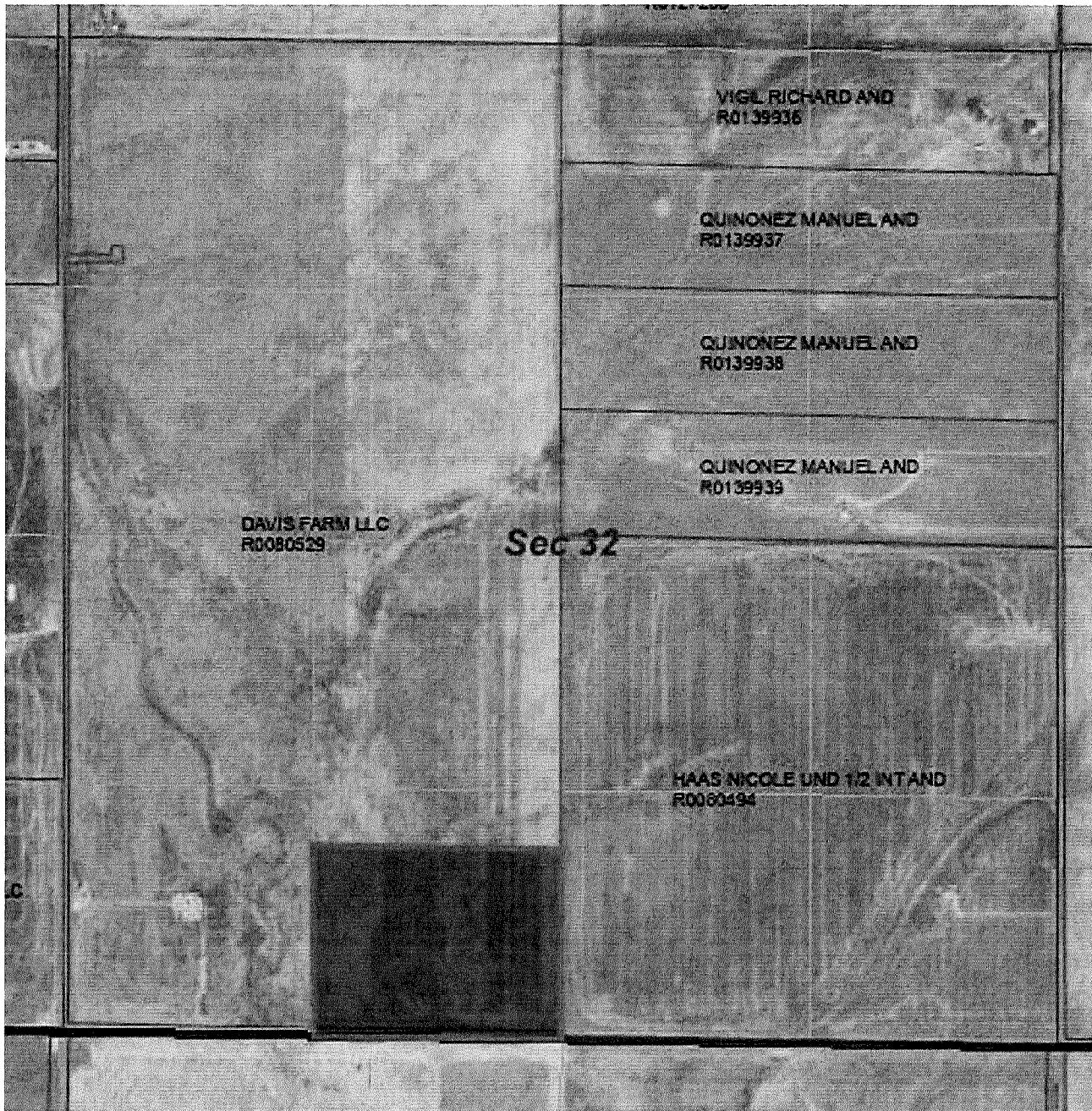
That portion of the Southeast $\frac{1}{4}$ of the Southwest $\frac{1}{4}$ of Section 32, Township 2 North, Range 64 West of the 6th P.M. as identified and outlined in Exhibit A-2 attached hereto, containing not more than 30 acres nor less than 25 acres.

Also excluding therefrom all oil, gas and other minerals, mineral rights and mineral interests now owned or otherwise obtained by Seller, provided however, except as to any existing rights one or more existing oil and gas lessees may have to surface entry and the right to use of the Property for the purpose of exploring for, drilling, developing, producing, or transporting such minerals, Seller expressly waives and relinquishes the right for itself and waives and relinquishes the right to grant any future oil and gas lessee the rights of surface entry and use of the property for the purpose of exploring for, drilling, developing, producing, or transporting such minerals on the Property.

And excepting all covenants, easements, leases, reservations, restrictions and rights of way of record.

EXHIBIT A-2

DEPICTION OF THE PROPERTY



6.0 Proof of Water and Sewer

6.1 Intention of Water and Sewer

There is no public sewer or water service available at the Project site. There are no septic systems within the Project area.

Minimal water use is required for operation of a solar facility. Potable water will be brought to the site during the construction and operations phases of the Project. Water for dust control during construction and operations (fire prevention, panel washing, and O&M building) will likely come from a combination of permitted commercial off-site resources that will be trucked in as needed. During operations, water tanks within the Project area will be maintained for Project and Fire District uses and supplemented with off-site resources as needed.

It is expected that natural rain and snow will provide for much of the solar panel washing during the operational phase of the Project. If additional solar panel washing by maintenance personnel is needed to ensure optimal power generation, water will likely be obtained through a commercial vendor that will deliver water to the site by truck.

If a septic system is needed, the Applicant will obtain an On-Site Wastewater Treatment System Permit from the Adams County Health Department. Coordination with Adams County Health Department has been initiated to confirm viability of obtaining an Onsite Wastewater Treatment system. The Applicant will obtain all required approvals and permits needed prior to construction of the Project.

Portable sanitary facilities will be provided during construction of the Project. Electricity for the O&M building and other auxiliary power needs will be provided by the local utility provider.

6.2 Proof of Sewer

A letter from Adam's County Health Department has been provided below.



ADAMS COUNTY HEALTH DEPARTMENT

— Your Health. Our Mission. —

Adams County Health Department
4430 S. Adams County Pkwy.
Brighton, CO 80601
720.523.7023
adcogov.org/health

05/28/2025

RE: Confirmation of intent to allow Onsite Wastewater Treatment System installation at **6800 Imboden Rd, Watkins CO 80137, Assessor Parcel Number 0181700000010**

To whom it may concern:

This letter is regarding a request for a “will-serve” letter from Adams County Health Department (ACHD) for a septic system permit at **6800 Imboden Rd, Watkins CO 80137, Assessor Parcel Number 0181700000010** in Adams County, CO. ACHD will allow the construction of an Onsite Wastewater Treatment System (OWTS) for a new building at this property provided the following stipulations are met:

1. A new OWTS installation application and application fee must be received for the OWTS for the proposed building prior to starting construction of the OWTS.
2. If the boundaries of any water and sanitation district and/or municipality are within 400 horizontal feet of any boundary of the property, a letter from the water and sanitation district and/or municipality indicating that they do not have an objection to an OWTS being installed at this address may need to be provided to ACHD.
3. The OWTS must have its own distinct OWTS design document with soil investigation work submitted with the application.
4. The OWTS design document must have a stamp from a Professional Engineer that is licensed in the State of Colorado to complete the soil investigation work and/or to design the OWTS system. Under certain circumstances as defined in ACHD Regulation O-22, the applicant may instead choose to use a “Competent Technician” to complete the soil investigation work and/or the design.
5. The design must conform with ACHD regulation O-22. Any sewage disposal system that is designed to produce 2000 gallons per day or more must be permitted by the Colorado Department of Health and Environment.
6. The site may be visited by ACHD for a site evaluation prior to approval and issuance of the OWTS permit. Depending on the conditions observed during this site evaluation, revisions to the proposed design may be required before the permit is issued.
7. Once ACHD issues the permit for the OWTS, installation of the OWTS may begin. The applicant or general contractor may choose any installer to complete the

installation of the OWTS, provided the installer maintains a valid “Systems Contractor” license from ACHD throughout the duration of the OWTS installation process.

8. The OWTS shall be inspected by ACHD after construction and prior to backfill. The OWTS will be given final approval after all deficiencies are corrected and all documentation is received in compliance with ACHD regulation O-22.

Please don't hesitate to reach out to me with any questions.

Best,

Marty Easter

Environmental Health Specialist
ADAMS COUNTY, COLORADO
7190 Colorado Blvd, Commerce City, CO 80022
O: 720.903.0996 | **Main:** | measter@adcogov.org
www.adamscountyhealthdepartment.org

To responsibly serve the Adams County community with integrity and innovation

7.0 Proof of Utilities (Gas, Electric, etc.)



WILL SERVE LETTER

June 17, 2025

William Vaughan, Development Manager
Lightsource bp
1125 17th St., Ste 2540
Denver, CO 80202

Re: PARCEL #0181700000010

Dear William,

This letter is to confirm that Xcel Energy is your utility provider for electric service. In accordance with our tariffs, on file with and approved by the Colorado Public Utilities Commission, electric facilities can be made available to serve the project at the southeast corner of Imboden Rd and E 72nd Ave in Adams County. The cost, and whether any reinforcements or extensions are required, for the Company to provide those facilities will be determined by your designer upon receipt of application and project plans.

Your utility service(s) will be provided after the following steps are completed:

- ***Application submitted to Xcel Energy's "Builders Call Line (BCL)"*** – once your application is accepted you will be assigned a design department representative who will be your primary point of contact
- ***Utility design is completed*** – you must provide your design representative with the site plan, the one-line diagrams, and panel schedules for electric and gas loads if applicable
- ***All documents provided by design representative are signed and returned***
- ***Payment is received*** (Residential Service Laterals if applicable)
- ***Required easements are granted*** - you must sign and return applicable easement documents to your Right-of-Way agent
- ***Site is ready for utility construction*** - the site ready information can be found on our website at may be viewed at [Construction and Inspection | Xcel Energy](#).

An estimated scheduled in-service date will be provided once these requirements have been met. It is important to keep in mind that the terms and conditions of utility service, per our tariffs, require that you provide adequate space and an easement on your property for all gas and electric facilities required to serve your project, including but not limited to gas and electrical lines and meters, transformers, and pedestals. General guidelines for requirements can be found on our website at [xcelenergy.com/InstallAndConnect](#).

Xcel Energy looks forward to working with you on your project and if I can be of further assistance, please contact me at the phone number or email listed below.

Sincerely,

Amy Caswell
Xcel Energy Planner

Mailing address: Public Service Company of Colorado
5460 W 60th Ave
Arvada, CO 80003

8.0 Legal Description

The legal description for the large-scale solar energy facility is provided in **Table 6**.

Table 6. Legal Description of the Project

Parcel Number	Legal Description	Tax ID	Acreage
0181700000006	Section, township, range: 3-3-64, Description: All of 640A	R0083289	640
0181700000009	Section, township, range: 4-3-64, Description: SE4 and S2 SW4 and NW4 SW4 280A	R0083291	280
0181700000010	Section, township, range: 5-3-64, Description: All, 628/76A	R0083292	628
0181700000022	Section, township, range: 10-3-64, Description: N2, 320A	R0083301	320
0181708100001	Section, township, range: 8-3-64, Description: NE4 except PARC (BK1 PG6137) 159/124 acre	R0221958	160
0181708400001	Section, township, range: 8-3-64, Description: E2 SE4 and except S 45 feet and except PARC (BK1 PG6137) 78/4524A	R0221960	79
0181709100001	Section, township, range: 9-3-64, Description: N2 except PARC (BK1 PG6137) 318/7993A	R0221962	319
0181709300001	Section, township, range: 9-3-64, Description: A parcel of land located in 8 and 9 described as beginning at the W4 corner of SD section 9 and considering the W LN of the NW4 of SD section 9 to BR S 00D 18M 31S E with all BRNGS continue herein relative thereto thence N 00D 36M 51S W along SD W LN of the NW4 of SD section 9 a distance of 67/96 feet thence S 88D 37M 22S E a distance of 770/00 feet thence S 00D 18M 31S E a distance of 1982/91 feet thence N 88D 37M 22S W a distance of 769/64 feet to a point on the W LN of the SW4 of SD section 9 thence N 00D 18M 31S W along the W LN of the SW4 of SD section 9 a distance of 1864/96 feet thence S 90D 00M 00S W a distance of 151/69 feet thence N 00D 18M 31S W a distance of 366/97 feet thence S 90D 00M 00S E a distance of 120/00 feet to a point on the W right-of-way LN of Quail Run Road thence S 00D 36M 51S E along the W right-of-way LN of Quail Run Road a distance of 316/98 feet thence N 90D 00M 00S E distance 30/00 feet to the point of beginning 36/07A	R0221959	36
0181709400001	Section, township, range: 9-3-64, Description: S2 except PARC (BK1 PG6137) 286/1806A	R0221961	286
Total	N/A	N/A	2,748

Source: Adams County Assessor 2024

Acronyms: E – east, N – north, S – south, W - west

9.0 Statement of Taxes Paid



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0083301	0181700000022	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor				
6301 MANILLA RD	Deborah Larson				
Legal Description					
SECT,TWN,RNG:10-3-64 DESC: N2 320A					
Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	43,537	11,490	2024	396	71.117
AG DRY GRAZING LAND - 4147	449	120	2024	396	71.117
Payments Received					
E-check		Multi-Account Payment			
Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$825.68	\$0.00	\$825.68	\$0.00
					\$825.68
					\$0.00
Balance Due as of Mar 3, 2025					

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0221960	0181708400001	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor
0	Deborah Larson

Legal Description	Property Code	Actual	Assessed	Year	Area	Mill Levy
SECT,TWN,RNG:8-3-64 DESC: E2 SE4 AND EXC S 45 FT AND EXC PARC (BK1 PG6137) 78/4524A	AG DRY FARMING LAND - 4127	10,585	2,790	2024	395	70.172

Payments Received	
E-check	Multi-Account Payment

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$195.78	\$0.00	<u>\$195.78</u>	\$0.00
				<u>\$195.78</u>	\$0.00
Balance Due as of Mar 3, 2025					\$0.00

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ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0221958	0181708100001	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor
0	Deborah Larson

Legal Description
SECT,TWN,RNG:8-3-64 DESC: NE4 EXC PARC (BK1 PG6137) 159/124A

Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	20,173	5,330	2024	395	70.172
AG DRY GRAZING LAND - 4147	140	40	2024	395	70.172

Payments Received	
E-check	Multi-Account Payment

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$376.82	\$0.00	\$376.82	\$0.00
				\$376.82	\$0.00
Balance Due as of Mar 3, 2025					\$0.00

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ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0221962	0181709100001	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor
0	Deborah Larson

Legal Description	318/7993A
SECT,TWN,RNG:9-3-64 DESC: N2 EXC PARC (BK1 PG6137)	318/7993A

Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	42,668	11,260	2024	395	70.172

Payments Received	Multi-Account Payment
E-check	

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$790.14	\$0.00	<u>\$790.14</u>	\$0.00
				<u>\$790.14</u>	\$0.00
Balance Due as of Mar 3, 2025					\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

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ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0083291	0181700000009	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor
0	Deborah Larson

Legal Description
SECT,TWN,RNG:4-3-64 DESC: SE4 AND S2 SW4 AND NW4 SW4 280A

Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	35,506	9,370	2024	395	70.172

Payments Received	
E-check	Multi-Account Payment

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$657.52	\$0.00	<u>\$657.52</u>	\$0.00
				<u>\$657.52</u>	\$0.00
Balance Due as of Mar 3, 2025					\$0.00

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ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0221961	0181709400001	Mar 3, 2025	2025-03-03-WEB-13706

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES OF
THE
15 RAINBOW VALLEY RD
PLACITAS, NM 87043-8800

Situs Address	Payor
0	Deborah Larson

Legal Description	286/1806A
SECT,TWN,RNG:9-3-64 DESC: S2 EXC PARC (BK1 PG6137)	

Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	40,680	10,740	2024	395	70.172

Payments Received	Multi-Account Payment
E-check	

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$753.66	\$0.00	<u>\$753.66</u>	<u>\$0.00</u>
				<u>\$753.66</u>	<u>\$0.00</u>
Balance Due as of Mar 3, 2025					\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

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ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0221959	0181709300001	Mar 4, 2025	2025-03-04-WEB-13882

HAWTHORNE MATTHEW AND
13343 JERSEY ST
THORNTON, CO 80602-9218

Situs Address	Payor
5980 QUAIL RUN RD	Matthew Hawthorne

Legal Description
SECT. TWN, RNG: 9-3-64 A PARC OF LAND LOCATED IN IN SECT 8 AND 9 DESC AS BEG AT THE W4 COR OF SD SECT 9 AND CONSIDERING THE W LN OF THE NW4 OF SD SECT 9 TO BR S 00D 18M 31S E WITH ALL BRNGS CONT HEREIN RELATIVE THERETO TH N 00D 36M 51S W ALG SD W LN OF THE NW4 OF SD SECT 9 A DIST OF 67/96 FT TH S 88D 37M 22S E A DIST OF 770/00 FT TH S 00D 18M 31S E A DIST OF 1982/91 FT TH N 88D 37M 22S W A DIST OF 769/64 FT TO A PT ON THE W LN OF THE SW4 OF SD SECT 9 TH N 00D 18M 31S W ALG THE W LN OF THE SW4 OF SD SECT 9 A DIST OF 1864/96 FT TH S 90D 00M 00S W A DIST OF 151/69 FT TH N 00D 18M 31S W A DIST OF 366/97 FT TH S 90D 00M 00S E A DIST OF 120/00 FT TO A PT ON THE W ROW LN OF QUAIL RUN RD TH S 00D 36M 51S E ALG THE W ROW LN OF QUAIL RUN ROAD A DIST OF 316/98 FT TH N 90D 00M 00S E DIST 30/00 FT TO THE POB 36/07A

Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	4,339	1,150	2024	395	70.172
FARM/RANCH RESID - 4277	27,171	1,000	2024	395	70.172
FARM/RANCH BLDG - 4279	35,772	9,440	2024	395	70.172
AG BUSINESS IMPRV - 4280	21,782	6,080	2024	395	70.172

Payments Received	
E-check	\$1,239.94

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$1,239.94	\$0.00	\$1,239.94	\$0.00
				\$1,239.94	\$0.00
Balance Due as of Mar 4, 2025					\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0083289	0181700000006	Mar 10, 2025	2025-03-10-WEB-15456

MINIS ADON CORPORATION
4904 KINGSTON DRIVE
ANNANDALE, VA 22003-6149

Situs Address		Payor				
0		Robert D Selim				
Legal Description						
SECT,TWN,RNG:3-3-64 DESC: ALL		640A				
Property Code	Actual	Assessed	Year	Area	Mill Levy	
AG DRY FARMING LAND - 4127	93,483	24,680	2024	396	71.117	
Payments Received						
E-check		\$1,755.18				
Payments Applied						
Year	Charges	Billed	Prior Payments	New Payments	Balance	
2024	Tax Charge	\$1,755.18	\$0.00	<u>\$1,755.18</u>	\$0.00	
Balance Due as of Mar 10, 2025						\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0083292	0181700000010	Feb 3, 2025	2025-02-03-WEB-2298

QUALLS AND PALMER LLC
6288 STATION MILL DR
PEACHTREE CORNERS, GA 30092-1890

Situs Address		Payor				
6800 IMBODEN RD		Qualls and Palmer, LLC Qualls and Palmer, LLC				
Legal Description						
SECT,TWN,RNG:5-3-64 DESC: ALL		628/76A				
Property Code		Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127		80,206	21,170	2024	395	70.172
AG OTHER LAND - 4167		27	10	2024	395	70.172
FARM/RANCH BLDG - 4279		12,366	3,260	2024	395	70.172
Payments Received						
E-check						\$1,715.00
Payments Applied						
Year	Charges	Billed	Prior Payments	New Payments	Balance	
2024	Tax Charge	\$1,715.00	\$0.00	\$1,715.00	\$0.00	
				\$1,715.00	\$0.00	
Balance Due as of Feb 3, 2025						\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com



Adams County Treasurer

Receipt of Tax Payment

Account	Parcel Number	Receipt Date	Effective Date	Receipt Number
R0083374	0181700000187	Nov 27, 2013	Nov 26, 2013	2013-11-26-SBr-6451

FRONT RANGE AIRPORT AUTHORITY
5100 QUAIL RUN ROAD
WATKINS, CO 80137-7131

Situs Address	Payor				
36055 E 48TH AVE	STORMWATER UTILITY TO COLLECT BALANCE				
Legal Description					
SECT,TWN,RNG:17-3-64 DESC: N2 320A					
Payments Received					
Cash	\$0.00				
Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
				\$0.00	\$0.00
Balance Due as of Nov 26, 2013					\$0.00



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0083428	0181700000288	Apr 29, 2024	2024-04-29-WEB-21663

WESTERN TRANSPORT LLC
1331 17TH ST STE 1000
DENVER, CO 80202-1566

Situs Address	Payor
0 AURORA	Western Transport

Legal Description	SECT,TWN,RNG:17-3-64 DESC: PARCEL 4B SW4 EXC PARC	155/69A			
Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	20,101	5,310	2023	054	124.804
FARM/RANCH RESID - 4277	188,422	8,940	2023	054	124.804
FARM/RANCH BLDG - 4279	32,909	8,690	2023	054	124.804

Payments Received	
E-check	Multi-Account Payment

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2023	Tax Charge	\$2,863.00	\$0.00	\$2,863.00	\$0.00
				\$2,863.00	\$0.00
Balance Due as of Apr 29, 2024					\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com



ADAMS COUNTY COLORADO

TREASURER'S OFFICE RECEIPT OF PAYMENT

Account	Parcel Number	Receipt Date	Receipt Number
R0080529	0172700000135	Jan 30, 2025	2025-01-30-JM-1052

DAVIS FARM LLC
7300 W STETSON PL APT 45
DENVER, CO 80123-2418

Situs Address	Payor
0	DAVIS FARM LLC 7300 W STETSON PL APT 45 DENVER, CO 80123-2418

Legal Description	319/798A				
SECT,TWN,RNG:32-2-64 DESC: W2 EXC PARC					
Property Code	Actual	Assessed	Year	Area	Mill Levy
AG DRY FARMING LAND - 4127	38,637	10,200	2024	351	101.488
AG DRY GRAZING LAND - 4147	898	240	2024	351	101.488

Payments Received	
Check	\$1,059.54
Check Number 1076	
Payor DAVIS FARM LLC 7300 W STETSON PL APT 45 DENVER, CO 80123-2418	

Payments Applied					
Year	Charges	Billed	Prior Payments	New Payments	Balance
2024	Tax Charge	\$1,059.54	\$0.00	<u>\$1,059.54</u>	\$0.00
				\$1,059.54	\$0.00
Balance Due as of Jan 30, 2025					\$0.00

ALL CHECKS ARE SUBJECT TO FINAL COLLECTION. THANK YOU FOR YOUR PAYMENT!

EMAIL: treasurer@adcogov.org | PHONE: 720.523.6160 | WEBSITE: www.adcotax.com

10.0 Trip Generation Analysis



July 7th, 2025

Adams County Community and Economic Development
4430 S. Adams County Parkway
Brighton, CO 80601

Re: **Trip Generation Analysis Letter**
Big Bronco Solar Project – Adams County, Colorado

Dear Reviewer,

The purpose of this Trip Generation Analysis (TGA) is to analyze and document the traffic impacts of the proposed Big Bronco Solar Project (Project) in support of a Conditional Use Permit for the Project. Lightsource Renewable Energy Operations, LLC (Lightsource BP) is proposing to construct, maintain, and operate a proposed 300-megawatt (MW) photovoltaic utility-scale solar power facility encompassing approximately 2,738 acres of private land (Project Area) in unincorporated Adams County, Colorado, approximately 5.7 miles northwest of the town of Bennett (Figure 1). A TGA was requested by Adams County to determine the level of traffic generated by the operational phase of the Project. On behalf of Lightsource BP, Tetra Tech, Inc. (Tetra Tech) has prepared this TGA to provide Adams County the trip generation data needed to determine whether additional traffic analyses may be required for the Project.

This TGA has been prepared in accordance with Chapter 8 of the Adams County Development Standards and Regulations, as well as guidance provided to Tetra Tech via email and phone by Mr. Matt Emmens, Adams County Community and Economic Development Department Senior Engineer, on February 20th, 2024 for a previous similar solar project in Adams County. Mr. Emmens outlined the expectations for development of a TGA, clarified that the analysis should focus on routine operational trip generation, and concurred that the Institute of Transportation Engineers' (ITE) Trip Generation Manual does not include codes specific to solar facilities. As an alternative to the ITE Trip Generation Manual, Mr. Emmens noted that Tetra Tech's proposed methodology of determining average operational traffic numbers by utilizing comparable solar facility traffic data to scale trip generation would be an acceptable method. A brief description of construction trip generation has been included in this letter for informational purposes only. Any roadway impacts from construction will be repaired in accordance with applicable conditions of the Conditional Use Permit granted by the County.

A vicinity map of the Project Area and associated transportation network is provided in Figure 1. The southern boundary of the Project is located along E 56th Avenue, approximately 3.5 miles north of Interstate 70 (I-70) and just north of the Colorado Air and Space Port. The majority of workers are anticipated to access the Project Area via I-70 to Watkins Road, then east on to U.S. Highway 36 (US-36) and north up County Road 25 N, which runs along the western edge of the Project Area. Traffic would then turn east on to E 72nd Avenue and into an existing driveway that would be used for Project traffic. Land use within the Project vicinity is agricultural, consisting of

rangeland, cultivated cropland with associated agricultural structures, and scattered rural residences.

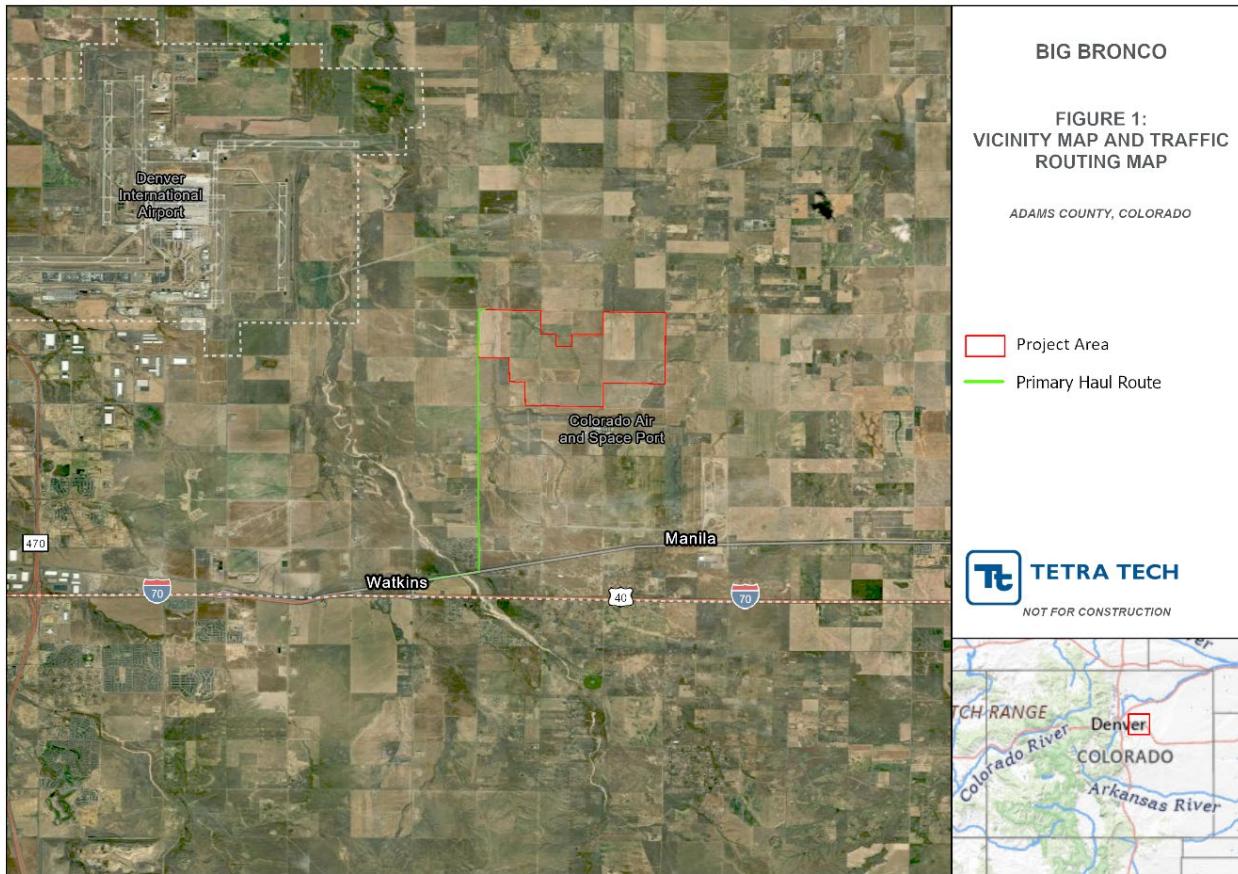


Figure 1: Vicinity and Traffic Routing Map

Trip Generation Analysis

Trip estimates for both construction and operations are provided below. Where appropriate, trips have been divided into Peak AM and PM Hour estimates. Construction and operational trip estimates were based on both routine and peak construction and operational workforce and delivery estimates provided by Lightsource BP.

Construction

During construction, the Project is expected to have a peak workforce of up to 500 workers. The Project is estimated to have a construction duration of around 20 months, with anticipated completion in Q1 2030. Workers are anticipated to originate mainly from the Denver Metro Area west of the Project and travel to the Project via I-70 and US-36. The workforce is likely to arrive between 6AM and 7AM (Peak AM Hour) and leave between 4PM and 5PM (Peak PM Hour). Due

to the rural nature of the Project location, it is likely that some workers may carpool. However, to account for the most conservative construction trip estimates, no carpooling was assumed. At the peak of construction, workers would generate 500 trips in the AM Peak Hour and 500 trips in the PM Peak Hour. In addition, the Project is expected to have 20 to 30 truck deliveries per day at the peak of construction, generating up to 60 additional one-way delivery vehicle trips per day.

Operations

Once the construction phase is complete, the Project will transition into the operational phase, which will last 40 years. At this point, only monitoring and maintenance personnel will routinely access the Project Area. Lightsource BP anticipates a peak of up to 15 operational employees on site at one time, however most routine day-to-day operations will likely require only 1-3 employees. To conservatively create an average operational trip generation estimate, it was assumed that 6 trips would be generated in the AM Peak Hour and 6 trips in the PM Peak Hour. It was also conservatively assumed that these trips would occur both during the work week and on weekends. This would result in an average of 12 total operational employee trips per day, and an average of 4,383 one-way employee trips per year.

In addition to routine personnel commuting trips during operation, non-routine trips will include panel washing approximately twice per year. This typically involves hauling water via truck to the Project Area to use for washing. For a 300-MW site, it is conservatively assumed that up to 1,000 water truck round trips would be necessary for each washing event (assuming all water would be sourced offsite). It is anticipated that these trips would be spread out over several weeks and would be unlikely to occur during peak hour times. Per year, this would result in an additional 4,000 one-way operational non-routine trips.

Combining the average employee trips and estimated panel washing truck trips, this results in a total of 8,383 one-way operational trips per year. Over the 40-year Project life, the Project would conservatively generate approximately 335,300 operational one-way trips, with the actual number of operational trips anticipated to be lower.

Conclusion

The total routine operational vehicle trips per day for the Project is estimated at an average of 12, with 6 trips generated in the AM Peak Hour and 6 trips in the PM Peak Hour. Given the low number of routine operational trips being generated, Tetra Tech anticipates any impact to the local traffic network will be negligible. Tetra Tech understands that these values do not meet the threshold for operational vehicle trips per day that would warrant additional analysis as part of a Traffic Impact Study.

If you have any questions or require any additional information, please do not hesitate to contact us at (303) 980-3549.

Sincerely,
TETRA TECH, INC.



Perry Patton, P.E.
Project Civil Engineer



Em Johnson E.I.T.
Senior Associate Civil Engineer

11.0 Supplemental Information

11.1 Landowner Outreach Summary



Lightsource bp
1125 17th St
Suite 2540
Denver, Colorado, 80202
www.lightsourcebp.com

October 14, 2025

[REDACTED]

Dear [REDACTED] and [REDACTED],

My name is Will Vaughan and I work for Lightsource bp, a company that develops large-scale renewable energy projects, like solar farms. I'm reaching out to you today because Lightsource bp is in the early stages of developing a project just north of the Colorado Air and Space Port. The project--Big Bronco Solar and Storage--is currently in the early stages of permitting.

I've called Colorado home for the last 20 years and--for the last 4 years--I've been developing Lightsource bp projects up and down the Front Range. Like you, I love what makes Colorado special—the wide-open spaces, friendly people, and all the amazing outdoor adventures we can enjoy year-round.

At Lightsource bp, we believe in working with local businesses, officials and landowners like you when we develop these projects. I've taken the liberty of including a map of the general area where the project will be built. Project progress and updates will be available on our website: <https://lightsourcebp.com/us/project/big-bronco-solar-and-storage/>.

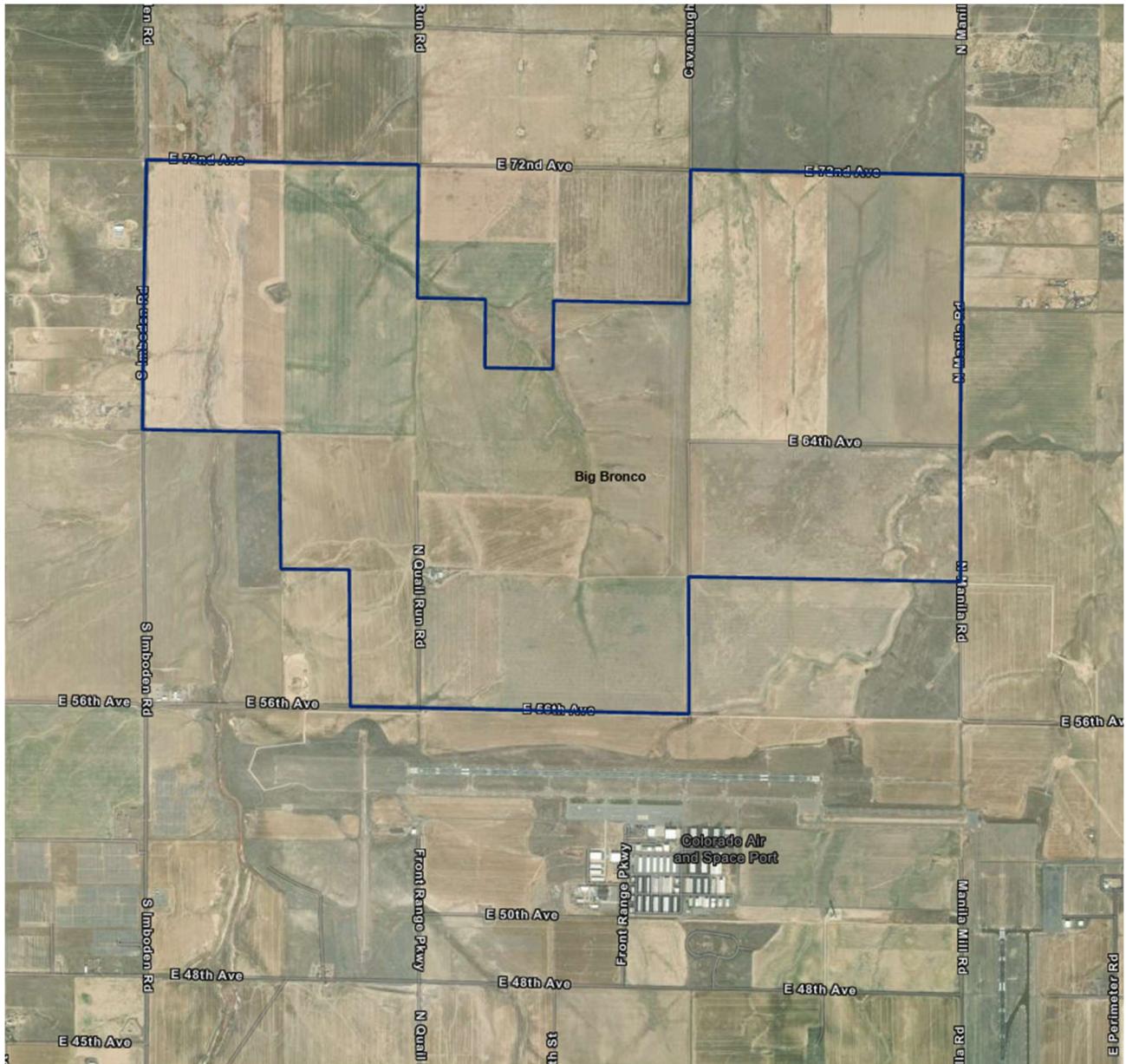
We're looking forward to helping Colorado meet its energy needs while preserving, conserving and enhancing the environment and biodiversity of the areas where our projects call home. As our team continues to advance this project, please do not hesitate to reach out to me personally with any questions you have.

Sincerely,

Will Vaughan

Will Vaughan
Lightsource bp
Manager, Development
970.946.2494 (cell)
will.vaughan@lightsourcebp.com

Big Bronco Solar and Storage Project- Adams County, CO



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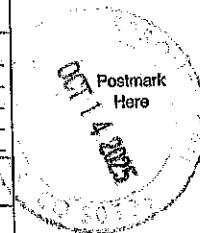
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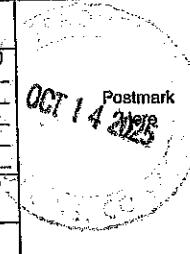
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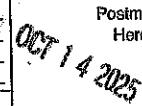
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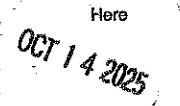
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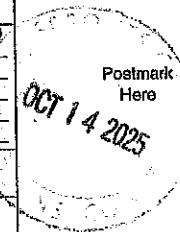
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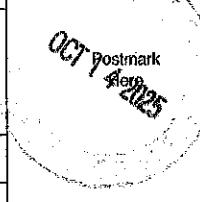
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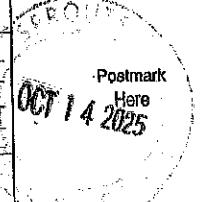
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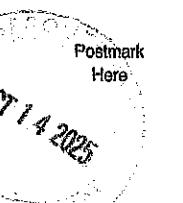
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11.2 Level 1 Storm Drainage Study

Level 1 – Storm Drainage Plan

Item No.	Submitted ¹	County Use Only		
		Rejected	N/A	
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sheet Size –24" x 36" or 11" x 17" or 8½" x 11"
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project Title Sheet
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Project Site Plan
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Title Block – include name and address of proposed project/development.
5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • Drawing Information • North arrow indicator • Section-Township-Range • Drawing Scale • Symbol Legend
6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Name, address and telephone of the applicant, agent, or owner.
7.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Name, address and telephone of the person preparing the plan.
8.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site Layout – including property boundaries, dimensions, area (in square feet or acres), adjoining street names and right-of-way widths.
9.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Contour Lines - from the best available source, spot elevations, or indications of direction and steepness of slopes, with the source clearly identified
10.	<input style="border: 1px solid black; padding: 2px; width: 15px; height: 15px;" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drainage Structures - including existing and proposed structures (pipes, catch basins , channels, ponds, irrigation ditches, etc.) and impervious surfaces (parking lots, driveways, patios, buildings, etc.)
11.	<input style="border: 1px solid black; padding: 2px; width: 15px; height: 15px;" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Utilities – existing and/or proposed with easements identified.
12.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Natural Features – including drainage channels, wetlands, water bodies, areas of natural vegetation, and flood plains.
13.	<input style="border: 1px solid black; padding: 2px; width: 15px; height: 15px;" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Area of Disturbance – including proposed clearing limits, areas to be graded, filled, excavated, or otherwise disturbed. The location of graded slopes shall be indicated, together with the proposed steepness and height. The location of stockpiles, haul roads and disposal sites shall also be indicated
14.	<input style="border: 1px solid black; padding: 2px; width: 15px; height: 15px;" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Erosion and Sedimentation Control – including location and type of erosion and sedimentation control measures proposed.
15.	<input style="border: 1px solid black; padding: 2px; width: 15px; height: 15px;" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	General Construction Notes – include notes for clarification (see Appendix for County Examples.)

Developer's Comments (please reference the item number for each comment)

*See preliminary Site Plan in CUP Application Attachment 4 for preliminary SDS Level 1 information. The Site Plan will be updated and require a final Site Plan Review. The final construction drawings will be prepared in accordance with the applicable Chapter 9 Storm Drainage Design and Stormwater Quality Control Regulations defined in the Adams County Development Standards and Regulations. The final Storm Drainage Plan will address Item #10, 11, 13, 14, and 15.

County's Comments

¹ To be checked by the Developer. If a "submitted" box is not checked, the Applicant must explain (in comment box above) or the application may be rejected for insufficient information.

12.0 References

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13.0 List of Appendices

Appendix A: Figures

Appendix B: Preliminary Noxious Weed and Vegetation Management Plan

Appendix C: Preliminary Decommissioning Plan

Appendix D: Referral Agency Outreach

Appendix E: Wetland Delineation Report

Appendix F: Wildlife Habitat Assessment

Appendix G: Cultural Resources Review

Appendix H: Phase I Environmental Site Assessment

Appendix I: Glint and Glare Analysis

Appendix J: Emergency Response Plan